

<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <h1 style="margin: 0;">EPA</h1> </div> <div style="text-align: center;"> <p>United States Environmental Protection Agency Washington, DC 20460</p> <h2 style="margin: 0;">Work Assignment</h2> </div> </div>		<p>Work Assignment Number 3-01</p> <p><input type="checkbox"/> Other    <input type="checkbox"/> Amendment Number:</p>								
<p>Contract Number EP-C-16-003</p>	<p>Contract Period   07/01/2016   To   06/30/2021</p> <p>Base                      Option Period Number                      3</p>	<p>Title of Work Assignment/SF Site Name NPDES Application forms</p>								
<p>Contractor EASTERN RESEARCH GROUP, INC.</p>		<p>Specify Section and paragraph of Contract SOW Contract Section 3.5, 3.9</p>								
<p>Purpose:</p> <div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> Work Assignment  <input type="checkbox"/> Work Assignment Amendment  <input type="checkbox"/> Work Plan Approval         </div> <div> <input type="checkbox"/> Work Assignment Close-Out  <input type="checkbox"/> Incremental Funding         </div> </div>		<p>Period of Performance</p> <p>From   07/01/2019   To   06/30/2020</p>								
<p>Comments:</p> <p>Work shall not start and cost cannot incur until July 1, 2019. On July 1, 2019, and in accordance with clause B.2 of the contract, immediate start is hereby approved for this work assignment. If the work plan is not approved within 30 calendar days after receipt of the work plan, the contractor shall stop work.</p>										
<div style="display: flex; justify-content: space-between; align-items: center;"> <input type="checkbox"/> Superfund         <div>Accounting and Appropriations Data</div> <input checked="" type="checkbox"/> Non-Superfund       </div>										
<p>SFO <input type="checkbox"/> (Max 2)</p> <p style="text-align: center; font-size: small;">Note: To report additional accounting and appropriations date use EPA Form 1900-69A.</p>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
07/01/2016 To 06/30/2021										
This Action:						532				
Total:						532				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee			LOE:			
Cumulative Approved:				Cost/Fee			LOE:			
Work Assignment Manager Name    Susanna Bains  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 202-564-2047 FAX Number:			
Project Officer Name    Tangela Cooper  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 202-566-0369 FAX Number:			
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name    Tammy Adams  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2030 FAX Number:			

**PERFORMANCE WORK STATEMENT  
CONTRACT EP-C-16-003  
WORK ASSIGNMENT 3-01**

**Title:** Technical Support for National Pollutant Discharge Elimination System (NPDES) Application Forms

**Work Assignment Contracting Officer's Representative (WACOR):**

Susanna Bains (4203M)  
Water Permits Division  
Office of Wastewater Management  
U.S. Environmental Protection Agency  
Washington, D.C. 20004  
202-564-2047  
[bains.susanna@epa.gov](mailto:bains.susanna@epa.gov)

**Alternate Work Assignment Contracting Officer's Representative (Alternate AWACOR):**

Laura Phillips (4203M)  
Water Permits Division  
Office of Wastewater Management  
U.S. Environmental Protection Agency  
Washington, D.C. 20004  
202-564-0741  
[Phillips.Laura@epa.gov](mailto:Phillips.Laura@epa.gov)

**Period of Performance:** July 1, 2019 through June 30, 2020

**Estimated Level of Effort:** 532 Hours

**Background Information:** The Water Permits Division (WPD), within the Office of Wastewater Management (OWM), is responsible for implementation and oversight of the NPDES permit program. This program regulates point source discharges of pollutants to surface waters of the United States. Development and implementation of training, guidance and outreach/communication tools are an important part of its mission.

Over the past several years, the Environmental Protection Agencies (EPA), OWM has undertaken a rulemaking effort that requires new information to be submitted with each of the eight NPDES permit application forms (Forms 1, 2A, 2B, 2C, 2D, 2E, 2F, and 2S). In conjunction with the regulatory changes, EPA has revised the format and content of each of the application forms and has revised and enhanced the instructions that accompany each form. As of June 12, 2019, facilities submitting applications to EPA (i.e., where EPA is the NPDES permitting authority), are required to use these revised application forms.



Where a state or U.S. Territory is the NPDES permitting authority, the state or territory will establish through its regulations and/or program implementation procedures, whether applicants for state-issued NPDES permit will use state-specific application forms, the previous versions of EPA's application forms, or the newly revised EPA application forms. [Note: States/Territories using state-specific forms or older versions of the EPA application forms will be required to make any changes necessary to conform to the new regulatory requirements for application forms within the timeframes established in the final rulemaking.]

Under a separate WA (WA 2-06/Contract EP-C-16-003), the Contractor assessed existing application procedures used by each of authorized NPDES state programs to determine whether the state uses EPA application forms, their own state-specific forms, or a combination of state and EPA forms. The Contractor also noted any supplemental information required by state application forms and any notable differences from the EPA application process.

The objective of this work assignment is to provide technical support to WPD in activities involving the revised application forms. These activities include future enhancements to the forms, reviews of state application forms, and development of training and outreach materials to assist NPDES applicants and program stakeholders in meeting the new requirements.

### **Performance Work Statement: Contract Section 3.5, 3.9**

The administrative and technical tasks to be provided by the Contractor under this work assignment shall support management, technical and logistical tasks associated with developing and implementing training and outreach materials concerning the revised application forms. The Contractor shall not be involved in Agency policy or decision making.

This Performance Work Statement establishes activities, described in the tasks below, to be conducted by the Contractor in FY2019 and FY2020.

#### **Task 1: Support for Future Enhancements to NPDES Individual Permit Application Forms**

The Contractor shall work with the EPA WACOR to identify enhancements to the PDF fill-and-print versions of the eight individual NPDES permit application forms that were developed and posted to EPA's applications and forms web page in June 2019. Enhancement could include changes to formatting, usability, error checking, and other elements of the forms to make them easier for applicants to use and for permitting authorities to review and extract information. Enhancements will be identified by EPA, applicants, and/or other users as the new forms are being implemented.

#### **Deliverables:**

- A. Revised forms with enhancements included.

## **Task 2: Support for Reviewing State NPDES Individual Permit Application Forms**

As requested by the EPA WACOR, the Contractor shall review specific state application forms to determine whether the state forms are consistent with EPA regulations, and shall identify inconsistencies. The Contractor shall provide a summary of the findings in a brief report, including a mark-up of the state form where appropriate, and recommendations for corrections necessary to make the state form consistent with Federal requirements. For costing purposes, the Contractor can assume EPA will require review of four state application forms in 10 authorized states.

### **Deliverables:**

- A. A draft report of state NPDES application adequacy (within 10 days following Technical Direction from EPA WACOR to begin effort).

## **Task 3: Support for Developing Outreach and Training Materials Related to NPDES Individual Permit Application Form Revisions**

As requested by the EPA WACOR, the Contractor shall provide support for development of training and guidance materials to support EPA Regions, states, and NPDES Permit Applicants in the use of EPA's revised NPDES application forms. Training will likely include webinars and recorded web-based training materials. The specific types of training will be determined by the EPA WACOR following discussions with stakeholders. The Contractor shall be responsible for setting up and leading the discussion during the webinar.

For costing purposes, the Contractor can assume there will be three 2-hour webinars held during this Period of Performance. EPA expects that webinars will primarily involve review and walk-through of the revised forms and does not anticipate the need to develop significant new training materials. EPA anticipates a 4-hour practice session approximately one week prior to each webinar.

Other possible outreach materials to be developed may include an application checklist or other documents to guide the applicant through the application process.

### **Deliverables:**

- A. Development of draft materials for three 2-hour webinars. Materials will include webinar agenda, brief handout materials, and speakers notes.
- B. Final handout and speaker note materials for the webinars.
- C. Development of guidance materials to assist applicants during the application process.
  - a. Development of a list of options for potential guidance materials.

## **Requirements**

### Reporting

Reports shall be submitted in accordance with the reporting requirements of the contract. In addition, the Contractor shall maintain contact with the EPA WACOR to advise of progress and problems. All documents shall be delivered in MS Word as requested by the WACOR. The Contractor shall notify the EPA CO and WACOR immediately when expenditures of 75% of the work assignment LOE or funding (including pipeline costs) are reached.

The Contractor shall be prepared to submit for inspection copies of all work in progress any time as requested by the WACOR. The Contractor shall not release information or comments on works performed under this work assignment without the WACOR's prior written authorization. Wherever practicable, all written materials submitted to EPA must be doubled-sided and on recycled paper. All electronic media submitted to the EPA WACOR shall be scanned for and identified as free from viruses.

The Contractor shall submit drafts and final products in hard copy as well as on the appropriate electronic media in a format compatible with Water Permits Division hardware.

### Travel

This work assignment includes local travel only, as needed.

### Information Collection

All collection of information and data shall be in accordance with the Office of Water Quality Management Plan and OMB requirements under the Paperwork Reduction Act.

### Conference/Meeting Guidelines and Limitations

The Contractor shall immediately alert the EPA WACOR to any anticipated event under the work assignment which may result in incurring an estimated \$20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The EPA WACOR will then prepare approval internal paperwork for the event and will advise the Contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

Performance Requirements and Measurable Standards: This WA will be evaluated in accordance with the Quality Assurance Surveillance Plan in the contract award document

<b>Deliverable</b>	<b>Schedule</b>
<b>Task 1 (A).</b> Revised Forms with enhancements included	As specified in technical direction from WACOR
<b>Task 2 (A).</b> Draft report of state NPDES application adequacy.	Within 10 days following Technical Direction from EPA WACOR to begin effort
<b>Task 3 (A).</b> Development of draft materials for three 2-hour webinars.	As specified in technical direction from WACOR
<b>Task 3 (B).</b> Final handout and speaker note materials for the webinars.	As specified in technical direction from WACOR
<b>Task 3 (C).</b> Development of guidance materials	As specified in technical direction from WACOR



**PERFORMANCE WORK STATEMENT**

**CONTRACT EP-C-16-003**

**WORK ASSIGNMENT 3-03**

**TITLE:** Support for Permitting Activities for Nutrient Pollution

**WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):**

Danielle Stephan  
U.S. Environmental Protection Agency  
Office of Wastewater Management Water Permits Division  
(4203M) Washington, DC 20460  
W: 202-564-0759 F: 202-564-9544  
Email: [stephan.danielle@epa.gov](mailto:stephan.danielle@epa.gov)

**ALTERNATE WORK ASSIGNMENT CONTRACTING  
OFFICER'S REPRESENTATIVE (AWACOR):**

Nizanna Bathersfield  
U.S. Environmental Protection Agency  
Office of Wastewater Management Water Permits Division  
(4203M) Washington, DC 20460  
W: 202-564-2258 F: 202-564-9544  
Email: [bathersfield.nizanna@epa.gov](mailto:bathersfield.nizanna@epa.gov)

**PERIOD OF PERFORMANCE:** July 1, 2019 through June 30, 2020

**ESTIMATED LEVEL OF EFFORT:** 1,270 hours

**BACKGROUND:** Water Permits Division (WPD), within the Office of Wastewater Management (OWM), is responsible for the implementation and oversight of the National Pollutant Discharge Elimination System (NPDES) permit program. This program regulates point source discharges of pollutants to surface waters of the United States. To effectively implement the NPDES program, WPD develops national regulations, policies, and guidance, and supports the Environmental Protection Agency (EPA), Regions, Tribes, and States. WPD also provides technical support to the regulated community in assuring compliance with the Clean Water Act (and other statutes as they relate to the NPDES program).

Nutrient pollution consists of excess contributions of nitrogen and phosphorus to the Nation's surface waters and has consistently ranked as one of the top causes of degradation in U.S. waters for more than a decade. Excess nitrogen and phosphorus lead to significant water quality problems including harmful algal blooms, hypoxia and declines in wildlife and wildlife habitat; as recently seen in places like the Gulf of Mexico and Chesapeake Bay.

Current approaches developed to address permitting for toxic pollutants do not fully address

the issues associated with developing nutrient permit limits that protect water quality standards.

Many waterbodies do not have numeric criteria for nutrients. The effects of nutrient pollution are widespread, and the sources are from both, point and non-point sources. Permitting authorities are often faced with a daunting task of protecting water quality, especially on impaired waters where no Total Maximum Daily Load (TMDL) has been developed.

It is essential that WPD effectively communicate information related to nutrient pollution in NPDES permits and how state and regional permitting authorities can address nutrient pollution. Using existing data sources and information about existing state implementation procedures, WPD Developed and implemented a series of in-person trainings to ensure the NPDES program effectively and efficiently achieves programmatic goals and protects water quality related to nutrient pollution.

To assist permit writers in determining how to develop permit limits for nutrient pollutants under such conditions, EPA is;

1. Adapt “in-person” training materials that have already been developed and piloted with state and regional permitting authorities to an online version that will be more readily available to permit writers,
2. Support 7 “in person” nutrient trainings/workshops with state permit writers and managers over the next 5 years
3. Support state and regional permitting authorities develop implementation procedures and water quality-based effluent limits for nutrients
4. Reviewing state water quality standards, implementation procedures, permits with nutrient limits, reasonable potential procedures, nutrient reduction strategies, technical documents developed by external stakeholders, and other information sources to inform the development of additional training resources and options for additions nutrient permitting practices.
5. Providing regular updates on the status of nutrient limits and monitoring requirements in NPDES permits.

**OBJECTIVE:** The objective of this work assignment is to provide technical support to EPA in its continued efforts to communicate information on nutrient pollution to NPDES permit writers on the state of nutrient requirements in NPDES permits, review and summarize state and regional implementation procedures related to nutrients, and update and develop online nutrients training materials. The target audience is NPDES permit writers, state and regional water program managers and other key NPDES program stakeholders, such as regulated point source dischargers.

**Performance Work Statement: Contract Sections 3.4, 3.5, 3.7, 3.9**

The administrative and technical tasks to be provided by the contractor under this work assignment shall support management, technical and logistical tasks associated with developing training materials and delivering the NPDES Permit Writer’s nutrients training course, and review and analysis related to implementation procedures for nutrient water quality standards. The contractor will not be involved in Agency policy or decision making.

As outlined above, technical support will include the following:

1. **Nutrient Training Materials** -Technical support will include updating existing training materials used to train state and regional NPDES permit writers in PowerPoint and adapt these materials to an online version of the training. Support will also entail assisting EPA in informing, educating, and involving key NPDES program stakeholders and permit writers on issues affecting implementation of the NPDES program as it pertains to the training. Reference guidance's includes but is not limited to, the Technical Support Document for Water Quality-based Toxics Control (1991), the U.S. EPA NPDES Permit Writers' Manual, Watershed-based NPDES Permitting Technical Guide, and Watershed- based permitting technical and implementation guidance, Water Quality Trading Toolkit for Permit Writers.
2. **Data collection and analysis** for NPDES permits with Nutrient requirements
3. **Nutrient Compendium** – Support the development of a State compendium of nutrient permitting practices.

**Task 1 – EPA HQ NPDES Nutrients On-line Course for EPA WPD/OWM's NPDES Website**

- A. **Update Finalized online Nutrient training materials:** The contractor shall make necessary changes/updates to the existing 8 modules for the Online Nutrients training for Permit Writers finalized under CONTRACT EP-C-16-003 WORK ASSIGNMENT 1-03 and 2-03. Changes will be identified by WACOR through issuance of technical direction. Upon receipt of the requested changes, the contractor shall make changes to the "*articulate storyline*" version of the training as well as update the printable PDF version of the training.

**Deliverables:**

	Deliverable	Due by
1	The contractor shall make changes to prepare training materials based on WACOR comments.	Up to 30 days after receipt of WACOR comments
3	Final NPDES Nutrients on-line course: deliver electronically via EPA SharePoint site two compact discs or memory sticks (including flash presentation and the webcast recordings)  PDF file of course slides and transcript compliant with all EPA web posting requirements (i.e. 508 compliant etc.)	Within 15 days of final comments from WACOR

- B. **Develop and finalize 3 additional training modules:** Under the last option period, the contractor delivered draft scripts and suggested slides for 3 additional training modules:



1) Watershed-based Permitting, 2) Water Quality Trading and 3) Compliance Schedules and Variances. The following is a description of work the contractor shall be expected to perform.

**Technical Expertise:** The Contractor shall provide at least one individual who is an expert in developing online training materials using the "*articulate storyline*" software. In addition, the contractor shall provide individuals with experience with Watershed-based permitting, Water Quality Trading, Compliance schedules and Water Quality Standards variances, to assist in the development of online training materials.

**Revise training materials:** EPA has developed 3 "flexibilities" modules in PowerPoint for the in-person trainings, that now need to be adapted to the online platform in storyline. The contractor shall provide technical and administrative support for the development and review of 3 additional training modules. The contractor shall provide document production support including drafting technical components, editing existing text or text provided by stakeholders, creating graphics to illustrate various concepts in the training, and formatting the supporting document and, when necessary, the training materials using appropriate desktop publishing software. Additional updates to these files may include; restructuring the order of existing slides for better flow and continuity, editing slide content to ensure it is consistent with current EPA policy, rules and regulations, develop test questions, developing scripts for each slide.

In developing the draft scripts and overall online structure, the contractor shall facilitate collection of, compile, summarize and provide draft responses to comments on training materials. EPA will review and identify comments to be incorporated into the supporting document. The contractor shall incorporate EPA's comments and edits into the training materials. For planning purposes, the contractor shall assume up to 5 drafts of training materials.

In order to finalize scripts for each module, the contractor shall participate in up to 5 one-day working sessions to finalize draft scripts. Upon completion of the working session(s) with WACOR, the contractor shall incorporate comments into the draft training materials and finalize the scripts for the 3 modules.

The contractor shall format the graphics and text of the training materials so that the "look and feel" is consistent with the "US EPA NPDES Permit Writers' Course," and 8 modules finalized under this work assignment.

These modules will become "Part 3" of the online nutrient training. The WACOR shall send the contractor the current version of the file

**Record audio for 3 modules:** once the scripts for each of the 3 modules are finalized, the contractor shall assist EPA in recording the audio for each slide for the online training.

**Converting power point training materials to an online platform:** The contractor shall convert training materials originally developed in powerpoint for the purpose of "in person" training to an online media format. The contractor shall use the "Storyline" presentation development software. Training modules shall be delivered to the

WACOR via an EPA internal only (not live) intra-agency link or site. The site shall be password protected.

**Alpha and Beta testing:** The contractor shall consolidate all comments received during the alpha and beta testing processes. The contractor, working closely with the WACOR, will review the comments and revise and finalize the on-line Nutrients course, as necessary. Edits shall include, but are not limited to:

- ensuring that the scripts are updated and accurately reflect any changes to script and/or audio,
- ensuring the slide animation on all slides matches the audio,
- re-recording any sections of the training that require content changes,
- that all available resources and hyperlinks are working properly.
- concept refinements for better viewer understanding,
- ensuring there are no errors in the visual or narration presentations,
- pacing or clarity of the presentations
- automated toggles or other course exercise features work including the certificate generation.

**Finalize online training materials:** Upon completion of the testing phases, and after all comments selected by the WACOR are addressed, the contractor shall deliver a draft final NPDES Nutrients on-line course for WACOR's final review within 30 days of completion and incorporation of beta testing comments.

Upon final review and as requested by the WACOR, the contractor shall deliver,

1. the final training electronically through EPA's SharePoint site, or contractor equivalent file transfer site, to post the final on-line course on EPA's WPD/OWM NPDES website which meets all of EPA's format and/or website posting requirements,
2. two compact discs or memory sticks of the final EPA HQ NPDES Nutrients on-line course which includes the flash presentation and the webcast recordings, and
3. A PDF version of the online Training slides and Transcripts that are 508 compliant for posting to EPA's website.

**Uploading to EPA's Website and development of communication and outreach materials-** Once the WACOR and EPA HQ managers have approved the final product the contractor will coordinate with the appropriate EPA NPDES website managers to upload the EPA HQ NPDES **Nutrients** on-line course and "go live." If after going live if there are problems the contractor and the WACOR will discuss with the EPA website managers what needs to be fixed or adjusted to ensure proper operation and use by public viewers.

**Deliverables:**

	Deliverable	Due by
1	The contractor shall prepare draft training materials reflecting suggested updates to structure and language, draft scripts, and graphics for 3 modules	Up to 30 days after WACOR and contractor working session.
2	The contractor shall participate comment resolution meetings on web-based training materials.	Up to 3 -one day working sessions to be scheduled after WACOR approves draft scripts
3	The contractor shall prepare final draft training materials based on WACOR comments	Up to 30 days after receipt of WACOR comments
4	The contractor shall adapt training PowerPoint materials into web-based training and provide draft materials to WACOR for review	Up to 30 days after receipt of WACOR comments
5	The contractor shall provide draft web-based training materials for Alpha and Beta testing phase.	Up to 30 days after receipt of WACOR comments
6	Consolidate comments from Alpha and Beta tests	Up to 30 days after receipt of WACOR comments
7	Final NPDES Nutrients on-line course: deliver electronically via EPA SharePoint site two compact discs or memory sticks (including flash presentation and the webcast recordings) PDF file of course slides and transcript compliant with all EPA web posting requirements (i.e. 508 compliant etc.)	Within 15 days of final comments from WACOR

**Task 2 – Analyze and Compile Effluent Data on Nutrient Pollution****A. General Permits Data Analysis**

In accordance with EPA's protocol, for fiscal year ending September 2019 the contractor shall pull general permitting data for any parameter code related to nutrient pollution for all 50 states and major territories from the Integrated Compliance Information System (ICIS-NPDES). In addition to data pulled from ICIS-NPDES, the contractor shall pull equivalent data from the EPA's Discharge Monitoring Report (DMR) Pollutant Loadings Tool. The purpose of this data pull is to aid in the comparison of data pulled directly from ICIS-NPDES with data pulled from the Loadings Tool. This analysis will help ensure the consistency of EPA's Office of Waste Management's nutrients data with data that is used by EPA's Office

of Oceans Wetlands and Watershed (OWOW) data pulls on behalf of the Hypoxia Task Force. The DMR Loadings Tool can be found at: <http://cfpub.epa.gov/dmr/>

The contractor shall produce up to 10 reports summarizing the general permitting data. The requirements of each report and table will be provided through written technical direction from the WACOR and deliverables will generally be due 14 working days after technical direction is given. EPA's permitting protocol, and the format for the nutrients table that is on EPA's website are each located in attachment 1 entitled "*Attachment 1- Nutrient Data Compilation and Analysis Outline\_10.15.2018.*"

The contractor shall analyze available data ICIS-NPDES for the following data field for general permitted dischargers:

Appendix 1 – List of fields to pull from ICIS SAP Business Intelligence for permits with nutrient monitoring/limits:

Region Code	State Code	Feature Latitude/Longitude.	Horizontal	Limit Unit	Short Desc	Limit
NPDES ID		Accuracy Measure (Meter)	Perm Feature	Unit Desc		
Facility Type	Code	Latitude/Longitude.	Source Map Scale	Limit Value	Type Code	Limit
Type Desc	Permit Name	Number	Perm Feature	Value Type	Desc	Limit Value
Facility Name		Latitude/Longitude.	Reference Point	Limit Value	Consolidation	Limit Value
Location Address	Supplemental Address	Desc	Perm Feature Latitude/Longitude.	Requirement	Short	Statistical Base Short
City	State Code	Geometric Type	Desc	Desc	Statistical Base	Long Desc Limit
Zip		Perm Feature Latitude/Longitude.		Value	Qualifier Code	Primary Permit
County Name		Horizontal Collect Method	Desc	Perm	SIC Code	Primary Permit SIC Desc
Section Township Range	Latitude in	Feature Latitude/Longitude.		Permit	SIC Code	
Decimal Degrees	Longitude in	Horizontal Reference Datum	Desc	Permit	SIC Desc	
Degrees	Horizontal Accuracy Measure	Perm Feature Water Body.	RAD Reach	Permit	SIC Primary Indicator	Primary
Source Map Scale	Number Reference Point	ID		Permit	NAICS Code	Primary Permit
Desc Geometric Type	Desc	Perm Feature Water Body.	RAD HUC	NAICS Desc	Permit	NAICS Code
Collect Method	Desc	Code based on Reach ID	Perm Feature	Permit	NAICS Desc	Permit
Horizontal Reference Datum	Desc	Water Body.	RAD Water Body Name	NAICS	Primary	
HUC Code	Tribal Land Code	Perm Feature Water Body.	State Water	Indicator	Primary Facility	SIC Code
Tribal Land Name		Body Code	Perm Feature Water Body.	Primary Facility	SIC Desc	Facility
USBC Tribal Land Code	Permit Type Code	State Water Body Name		SIC Code		
Permit Type Desc	Facility Type	Perm Feature ID		Facility	SIC Desc	
Indicator		Perm Feature Flow.	App Actual	Facility	SIC Primary Indicator	Primary
Curr. Major Minor Status	Total App.	Average Flow (MGD)	Perm Feature	Facility	NAICS Code	Primary Facility
Design Flow (MGD)	Total Actual Average	Flow.	Application Design Flow	Limit	NAICS Desc	Facility NAICS Code
Flow (MGD)		Set Designator			Facility NAICS Desc	Facility
Permit Status Code	Permit	Limit Set Name	Limit Set	NAICS	Primary Indicator	
Status Desc	Issue Date	Type Desc		Component	Type Code	Component
Effective Date	Expiration Date	Limit Set DMR Comments	Change of	Type Desc	Curr. Compl. Track.	Status
State Water Body		Limit Status Desc	Parameter Code	Curr. Compl. Track.	Status Start Dt	
State Water Body Name	Perm Feature	Parameter Desc	Monitoring Location	Curr. Compl. Track.	Status End Dt	
Type Desc	Perm Feature Desc	Code Monitoring	Location Desc	Limit	Dmr Non Receipt	Flag Rnc
Perm Feature		Season ID	All Months	Limit Applies -	Tracking Flag	MGP
Latitude/Longitude		Short Basis Of		NPDES ID	MGP Gen. Perm.	
Latitude in	Decimal Degrees	Perm Feature	Limit Code	Basis Of	Limit Desc	Eligible
Latitude/Longitude.	Longitude in	Decimal	for Burden Reduction?	Any Effluent	Industrial Cat. Desc.	FRS
Degrees	Perm	Trade in Place?			Facility UIN	FRS HUC Code
		Limit Type Code	Limit		ICIS Facility	Interest ID
		Type Desc	Limit Start			
		Date	Limit End Date			
		Limit Frequency of Analysis	Desc			
		Limit Sample Type	Desc			

Raw data reports for general permitted facilities should be provided to EPA in separate files.

**Deliverables:**

	Deliverable	Due by
1	Nutrient general permitting data analysis report from ICIS-NPDES	Within 14 days of receipt of Technical Direction from the WACOR
2	Nutrient general permitting data analysis report from ICIS-NPDES and the DMR Loadings Tool, filtering out all the facilities outside of the Mississippi River Basin watershed	Within 14 days of receipt of Technical Direction from the WACOR

**B. Individual Permits Data Analysis**

In accordance with EPA's protocol, for fiscal year ending September 2019, the contractor shall pull data on any parameter code related to nutrient pollution for all 50 states and major territories from the Integrated Compliance Information System (ICIS-NPDES). In addition to data pulled from ICIS-NPDES, the contractor shall pull equivalent data from the EPA's Discharge Monitoring Report (DMR) Pollutant Loadings Tool. The purpose of this data pull is to aid in the comparison of data pulled directly from ICIS-NPDES with data pulled from the Loadings Tool. This analysis will help ensure the consistency of EPA's Office of Waste Management's nutrients data with data that is used by EPA's Office of Oceans Wetlands and Watershed (OWOW) data pulls on behalf of the Hypoxia Task Force. The DMR Loadings Tool can be found at: <http://cfpub.epa.gov/dmr/>

The contractor shall deliver up to 15 reports that summarize trends in the permit limit data with a focus on permit limit characteristics and monitoring requirements for individual permits and general permits. These reports will include a set of data reports using the data pull from ICIS with facilities outside of the Mississippi/Atchafalaya River Basin (MARB) filtered out, and a set of data reports using the data pull from the DMR Loadings Tool with facilities outside of the MARB filtered out. The contractor shall also deliver a table of NPDES nutrient monitoring and limits data, using the data from the ICIS data pull, and formatted in accordance with EPA's web format.

The requirements of each report and table will be provided through written technical direction from the WACOR and deliverables will generally be due 14 working days after technical direction is given. EPA's permitting protocol, and the format for the nutrients table that is on EPA's website are each located in attachment 1 entitled "Attachment 1- *Nutrient Data Compilation and Analysis Outline\_10.15.2018.*"

The contractor shall analyze available data from ICIS-NPDES for the following data fields for individually and general permitted dischargers: See Appendix 1 above.

Raw data reports for individual permitted facilities should be provided to EPA in separate files.

**Deliverables:**

	Deliverable	Due by
1	Nutrient permitting data analysis report from ICIS- NPDES	Within 14 days of receipt of Technical Direction from the WACOR
2	Nutrient permitting data analysis report from ICIS- NPDES and the DMR Loadings Tool, filtering out all the facilities outside of the Mississippi River Basin watershed	Within 14 days of receipt of Technical Direction from the WACOR
3	Table of nutrient permitting data from ICIS- NPDES, using EPA's web format	Within 14 days of receipt of Technical Direction from the WACOR

**Task 3 – Compendium of State NPDES Nutrient Practices**

**Note:** Work on this task has already started on the previous work assignment (WA 2-03). The contractor shall continue work started under the last option period.

EPA has been working on a compendium of state practices, policies and procedures targeted to reducing nutrients from point sources. The purpose of the compendium is to facilitate state-to-state sharing about different methods of addressing the adverse effects of nutrient pollution in NPDES permits. Several states have developed practices and procedures for nutrient pollution, while others are still discerning how to address nutrients. This compendium will serve as a “clearing house” for the various procedures, and open dialog on the different approaches.

The compendium may include information on the following procedures and practices:

- Mixing Zone Policies for Nutrients
- Variance Policies
- Critical Low Flows
- Critical Effluent Concentrations
- Background Concentrations
- State Performance Based Approaches
- Water Quality Trading for Nutrients
- Watershed-Based Permitting
- TMDL implementation

The contractor shall assist the WACOR with drafting content for the compendium document, editing content already drafted by EPA experts and finalizing the compendium materials.

The contractor shall use, for the most part, publicly available information to draft content for the compendium on the following topic areas:

- Critical Conditions for Nutrient Pollution
  - Critical Low Flows
  - Critical Effluent Concentrations
  - Background Concentrations
- State Performance Based Approaches
- Water Quality Trading for Nutrients
- Watershed-Based Permitting

Sources of publicly available information can include but are not limited to the following; draft and final permits and permit factsheets, policy documents, strategy documents, implementation plans, watershed plans, TMDL documents and state websites.

When drafting content for the compendium, it may be necessary for the contractor to communicate with state and regional contacts. The WACOR will provide contact information to the contractor for the purposes of acquiring additional information and clarification on state procedures related to element of the compendium from State and regional contacts.

For planning purposes, the contractor shall assume development and review of content for up to 20 states. Assume each state write up shall be no more than 3 pages. The WACOR will provide examples of content already drafted as a template.

The contractor shall also help manage the state and regional review process for content in the compendium. Once content has been reviewed by EPA management, it will be sent to regional and state staff for review. Regional and state comments and changes shall be collected, and compendium content shall be edited to incorporate the comments.

Finalizing the document shall include formatting, graphic work and technical editing. The contractor shall make sure that the document looks professional and consistent with the "look and feel" of other compendium documents produced by EPA. The WACOR shall send example documents to the contractor, so they can see other compendiums that EPA has produced. The contractor shall use Microsoft word, publisher other compatible publishing software as long as the WACOR has access to the program and can make edits once the final document is delivered.

**Deliverables:**

	Deliverable	Due by
1	Draft write-ups for individual elements of the compendium	Within 30 days of receipt of Technical Direction from the WACOR
2	Consolidate comments from regions and state review of compendium	Within 15 days of receipt of comments
3	Draft compendium document	Within 15 days of technical direction from WACOR



4	Final compendium document	Within 20 days of receipt of Technical Direction from the WACOR
---	---------------------------	---

**Reporting Requirements:** Reports shall be submitted in accordance with the reporting requirements of the contract. In addition, the contractor shall maintain contact with the WACOR to advise the WACOR of progress and problems. All documents shall be delivered in a format compatible with Microsoft Office 2013, HTML, and/or PDF format, as requested by the WACOR. The contractor shall notify the WACOR immediately when expenditures of 75% and 90% of the work assignment LOE or funding (including pipeline costs) are reached.

The contractor shall be prepared to submit for inspection copies of all work in progress any time as requested by the WACOR. The contractor shall not release information or comments on works performed under this work assignment without the WACOR's prior written authorization. Wherever practicable, any written materials submitted to EPA must be doubled-sided and on recycled paper. Any computer disks submitted to the WACOR shall be scanned for and identified as free from viruses.

**Anticipated Travel Requirements:** Some limited local travel may be necessary to attend meetings with the WACOR.

**Additional Requirements:** Upon issuance of written technical direction, the contractor shall submit for inspection all work in progress at any time under this work assignment. The contractor shall develop and maintain files supporting each task. The contractor shall contact the CL-COR and/or WACOR by telephone to discuss any problems that may adversely affect the work on this Work Assignment. Within five (5) calendar days the contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be made available to the CL-COR and the WACOR.

**Contractor Identification:** To avoid any perception that contractor personnel are EPA employees, the contractor shall assure that contractor personnel are clearly identified as independent contractors of EPA when attending meetings with outside parties or visiting field sites.

### **Control Requirements:**

#### Quality Assurance Project Plan (QAPP):

A quality assurance project plan (QAPP) is not required for Tasks 0, 1, and 3 of this work assignment. However, Task 2 will require a Quality Assurance Project Plan (QAPP) which outlines the contractor's decision criteria that the contractor used in developing data analysis and summary charts for nutrient permitting data. The sources of the information collected by the contractor for EPA are primarily from publicly available information sources and considered secondary data. The data quality objective for this information is that the nutrient permitting data analysis factually represent the information contained in the source documentation.

The contractor shall refer all policy related questions to EPA. The contractor shall provide QAPP for tasks 2, within 15 days of receipt of work assignment.

#### Enforcement Sensitive Information

The contractor recognizes that contractor employees in performing tasks specified by this WA may have access to data/information, either provided by the government or first generated during contract performance, of enforcement sensitive nature which should not be released to the public without Environmental Protection Agency (EPA) approval.

Enforcement sensitive refers to records or information compiled for law enforcement purposes (whether administrative, civil or criminal), the disclosure of which could reasonably be expected to interfere with the enforcement action. It is imperative that all contractor personnel, including but not limited to, subcontractor and consultant personnel assigned to work on this contract and/or WA, or with access to materials developed pursuant to such efforts, understand that this information is confidential, and any disclosure or misuse of the information may result in prosecution to the fullest extent of the law. All contractor personnel are expected to exercise due diligence in safeguarding, handling or disposing of any such information.

#### Project Employee Confidentiality Agreement

The contractor agrees that the contractor employee shall not disclose, either in whole or in part, to any entity external to the EPA, the Department of Justice, or the contractor, any information or data (as defined in FAR Section 27.401) provided by the government or first generated by the contractor under this contract, any site-specific cost information, or any enforcement strategy without first obtaining the written permission of the WACOR. If a contractor, through an employee or otherwise, is subpoenaed to testify or produce documents, which could result in such disclosure, the contractor must provide immediate advance notification to the EPA so that the EPA can take action to prevent such disclosure. Such agreements shall be effective for the life and for a period of five (5) years after completion of the contract.

#### Handling of Confidential Business Information (CBI)

Contractor's access to TSCA CBI must comply with the procedures set forth in the TSCA CBI Security Manual. Likewise, access to FIFRA CBI shall follow the security procedures set forth in the FIFRA Information Security Manual.

To the extent that the work under this contract requires access to proprietary or confidential business or financial data of other companies, and as long as such data remains proprietary or confidential, the contractor shall protect such data from unauthorized use and disclosure.

All files or other information identified as Confidential Business Information (CBI) shall be treated as confidential and kept in a secure area with access limited to only contractor personnel directly involved in the case or special project assignment. The contractor, subcontractor, and consultant personnel are bound by the requirements and sanctions contained in their contracts with the EPA and in EPA's confidentiality regulations found at

40 CFR Part 2, Subpart B. Subcontractors and consultants must adhere to EPA-approved security plans which describe procedures to protect CBI and are required to sign non-disclosure agreements before gaining access to CBI.

All official data, findings, and results of investigations and studies completed by the contractor shall be available for EPA and DOJ internal use only. The contractor shall not release any part of such data without the written direction of the WACOR.

#### Conference/Meeting Guideline and Limitations

The contractor shall immediately alert the WACOR to any anticipated event under the work assignment which may result in incurring an estimated \$20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The WACOR will then prepare approval internal paperwork for the event and will advise the contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

#### Performance Requirements and Measurable Standards

This work assignment will be evaluated in accordance with the Quality Assurance Surveillance Plan in the contract award document.

**Note:** The Contractor shall notify the CO and EPA WACOR in writing when 75% of the authorized work assignment LOE/labor hours and cost have been expended.



<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 3-03				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-16-003			Contract Period 07/01/2016 To 06/30/2021 Base                      Option Period Number      3			Title of Work Assignment/SF Site Name Support Nutrient Permitting				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From 03/04/2020 To 06/30/2020					
Comments: Amendment 000001 removes Task 1 from the original WA and adds a new Task 4. A revised work plan/cost estimate is required.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> (Max 2)                      Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE: 1,270						
07/01/2016 To 06/30/2021										
This Action:				495						
Total:				1,765						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee			LOE:			
Cumulative Approved:				Cost/Fee			LOE:			
Work Assignment Manager Name Danielle Stephan							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-564-0759			
							FAX Number:			
Project Officer Name Tangela Cooper							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-566-0369			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name Tammy Adams							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 513-487-2030			
							FAX Number:			

**PERFORMANCE WORK STATEMENT (PWS)**  
**EPA CONTRACT NUMBER: EP-C-16-003**  
**WORK ASSIGNMENT NUMBER: 3-03**  
**AMENDMENT # 000001**

**WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):**

**Danielle Stephan**

**U.S. Environmental Protection Agency**

**Office of Wastewater Management Water Permits Division (4203M) Washington, DC 20460**

**W: 202-564-0759 F: 202-564-9544**

**Email: stephan.danielle@epa.gov**

**ALTERNATE WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):**

**Nizanna Bathersfield**

**U.S. Environmental Protection Agency**

**Office of Wastewater Management Water Permits Division (4203M) Washington, DC 20460**

**W: 202-564-2258 F: 202-564-9544**

**Email: bathersfield.nizanna@epa.gov**

The purpose of this work assignment (WA) amendment 000001 is to:

1. **remove** the following existing task.
  - **Task 1 – The Environmental Protection Agency (EPA) Headquarters (HQ) National Pollutant Discharge Elimination System (NPDES) Nutrients On-line Course for EPA Water Permits Division (WPD)/Office of Wastewater Management's (OWM) Website**
2. **add** the following new task
  - **TASK 4 – Watershed-based Permitting Case Studies**
3. **Update the Quality Assurance Project Plan (QAPP)** to include Task 4

**Task 4: Update and Draft New Watershed-based Permitting Case Studies for Nutrients**

The contractor shall **update up to 5 existing** and **develop up to 2 new case studies** to highlight NPDES permits and state practices related to watershed-based permitting and controlling Nutrient Pollution. The Contractor shall collect and compile publicly available information and data, provide professional editing and document production, and research and analysis for each case study.

**Existing case studies** that need to be updated were originally developed to accompany and illustrate the concepts contained in the *Watershed-Based National Pollutant Discharge*

*Elimination System (NPDES) Permitting Technical Guidance* and were last updated in 2007 to 2010. The existing case studies can be found at EPA's Watershed-based Permitting Website: <https://www.epa.gov/npdes/watershed-based-permitting>. Since the case studies are not all related to nutrient pollution, the EPA WACOR will identify which of the existing case studies the contractor shall update.

The contractor shall develop the **new case studies** following the same look and feel as the existing case studies. The EPA WACOR will provide information on the new case studies to be developed. The EPA WACOR will provide the contractor with a template to be used for the new case study development (See Attachments 1 and 2). The development of new case studies shall involve working with Regions and States in which the case study projects are taking place in order to gather the information necessary.

These documents are expected to go through up to 5 iterations of review before they are finalized. The contractor shall provide electronic files of each document to the EPA WACOR and other EPA HQ and Regional staff as designated by the EPA WACOR for review. The contractor shall coordinate review of all comments on each document, provide a response to comment document and update the case studies as requested by EPA WACOR. Upon finalization of each document, the contractor shall deliver the final documents meeting all the requirements necessary to publish the document on EPA's website (e.g., Meets 508 compliance, meets requirements of EPA style guide etc.) to the EPA WACOR within 14 days of the EPA WACOR's written technical direction that the document is final.

**Special Instruction:**

- EPA WACOR will provide technical direction(s) as needed to clarify the requirements.

**DELIVERABLES:**

- The contractor shall provide EPA with drafts of up to five updated case studies no later than May 15, 2020.
- The contractor shall provide EPA with drafts of up to 2 new case studies no later than June 15, 2020.
- The contractor shall prepare the final Case Studies within 14 days of the receipt of the EPA WACOR's comments on the last draft document.

**Updated Quality Assurance Project Plan (QAPP) language in the PWS:**

A quality assurance project plan (QAPP) is not required for Tasks 0, 1, and 3 of this work assignment. However, Task 2 will require a Quality Assurance Project Plan (QAPP) which outlines the contractor's decision criteria that the contractor used in developing data analysis and summary charts for nutrient permitting data. Task 4 will also require a QAPP which outlines the contractor's decision criteria that the contractor used in collecting information to develop the new case studies under this task. The sources of the information collected by the contractor for EPA are primarily from publicly available information sources and considered existing data. The data quality objective for this information is that the nutrient permitting data analysis factually represent the information contained in the source documentation.

The contractor shall refer all policy related questions to EPA. The contractor shall provide an updated QAPP, modified to include task 4, within 15 days of receipt of work assignment amendment.

**ESTIMATED LEVEL OF EFFORT:**

The estimated level of effort (LOE) for this work assignment is 495 hours.



<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-16-003			Contract Period   07/01/2016   To   06/30/2021 Base                      Option Period Number       3			Title of Work Assignment/SF Site Name Wet Weather Program				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   07/01/2019   To   06/30/2020				
Comments: Work shall not start and cost cannot incur until July 1, 2019. On July 1, 2019, and in accordance with clause B.2 of the contract, immediate start is hereby approved for this work assignment. If the work plan is not approved within 30 calendar days after receipt of the work plan, the contractor shall stop work.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
07/01/2016 To 06/30/2021										
This Action:						871				
Total:						871				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee			LOE:			
Cumulative Approved:				Cost/Fee			LOE:			
Work Assignment Manager Name   Mohammed Billah							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-564-2228			
							FAX Number:			
Project Officer Name   Tangela Cooper							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-566-0369			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name   Tammy Adams							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 513-487-2030			
							FAX Number:			

**PERFORMANCE WORK STATEMENT  
EPA CONTRACT NUMBER: EP-C-16-003  
WORK ASSIGNMENT NUMBER: 3-05**

1. **TITLE:** Support for Implementation of Wet Weather Pollution Control Programs

2. **ESTIMATED PERIOD OF PERFORMANCE:**

The period of performance shall be from July 01, 2019 through June 30, 2020.

3. **EPAWORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):**

Mohammed Billah  
Municipal Branch (MC: 4203M)  
Water Permits Division (WPD)  
Office of Wastewater Management  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460  
(202) 564-2228  
billah.mohammed@epa.gov

**ALTERNATE EPAWORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (AWACOR):**

Lisa Biddle  
Municipal Branch (MC: 4203M)  
Water Permits Division  
Office of Wastewater Management  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460  
(202) 566-0350  
Biddle.Lisa@epa.gov

4. **OBJECTIVES:**

This Work Assignment provides support to Combined Sewer Overflow (CSO) program, and Sanitary Sewer Overflow (SSO) activities, for the WPD.

## **5. STATEMENT OF WORK:**

### **TASK 1: Combined Sewer Overflow (CSO) Program Support**

The contractor shall support EPA's effort related to the Combined Sewer Overflow Program support activities. The activities may include data collection, fact sheet development, CSO workshop support activities, and other related activities. The WACOR will provide more specific guidance via written technical direction (TD) as needed.

#### **Special Instruction:**

- EPA believes the LOE for this task will be as below.
  - PM – 20
  - PL4 = 70
  - PL3 = 80
  - PL2 = 90
  - PL1 = 40
  - Total = 300 LOE

### **TASK 2 – Updating Smart Data Infrastructure for Wet Weather Control and Decision Support Document and Related Case Studies**

The contractor shall support EPA in updating the Smart Data Infrastructure for Wet Weather Control and Decision Support document with new technologies and approach. The contractor shall do market research for new technologies. The contractor shall develop a new case studies document in support of the Smart Data Infrastructure for Wet Weather Control and Decision Support document. The WACOR will be providing the Smart Data Infrastructure for Wet Weather Control and Decision Support document, and new case studies.

#### **DELIVERABLES:**

- Draft case studies and updated technology document within 10 weeks of receiving the case studies from WACOR
- Final version of the document within 4 weeks of receiving comments from WACOR
- Finalize the document with appropriate editing and making it 508 compliance within 2 weeks of receiving final request via written TD from WACOR.

#### **Special Instruction:**

- EPA believes the LOE for this task will be as below.
  - PM – 10

- QA Manager – 5
- PL4 = 40
- PL3 = 10
- PL2 = 10
- Total = 75 LOE

### **TASK 3 – Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) Data Collection**

The contractor shall be working with nine EPA Regions, Region 6 does not have any CSO, to collect the CSO LTCP data as below. If necessary, the contractor shall reach out to the individual permittee through EPA Regions and States to collect the necessary data when the data is not readily available to EPA Regions and/or respective States. The contractor shall be collecting the following data and information.

- a. Status of the LTCP
  - i. Development Phase
  - ii. Implementation Phase
  - iii. Post Construction Phase
  - iv. Milestones
  - v. Approach
    - 1. Presumption
    - 2. Demonstration
    - 3. Sewer Separation; or
    - 4. Any other acceptable measures
  - vi. Green control practices
  - vii. Smart Data Infrastructure
  - viii. Public Notification
  - ix. Status of Post Construction Compliance Monitoring (PCCM) Program
    - 1. Number of approved PCCM program
    - 2. Effectiveness of data collection
    - 3. Availability of PCCM data
    - 4. Any other relevant information to determine the status of data collection
  - x. Any Integrated Approach
    - 1. Planning
    - 2. Implementation
- b. Any challenges?
  - i. Water Quality-Based Effluent Limit (WQBEL) Expectation
  - ii. Implementation Schedule
  - iii. Financial Capability
- c. Summary Report of Findings

**Instruction:**

- WACOR will be issuing TD with more specific direction when it is needed
- WACOR will be providing the existing CSO Data Spreadsheet
- WACOR will be providing the EPA Regional contact information

**DELIVERABLES:**

- The contractor shall submit a draft CSO Data Spreadsheet within 20 weeks of finalizing the Work Plan
- The contractor shall submit the final CSO Data within 4 weeks of receiving comments from WACOR
- The contractor shall submit the draft Summary Report of Findings within 4 weeks of finalizing the CSO Data Spreadsheet
- The contractor shall submit the final Summary Report of Findings within 4 weeks of receiving comments on the draft Summary Report of Findings from WACOR

**Special Instruction:**

- EPA believes the LOE for this task will be as below.
  - PM – 30
  - QA Manager – 10
  - PL4 = 100
  - PL3 = 75
  - PL2 = 125
  - Total = 340 LOE

**TASK 4 – Finalizing CSO Modeling Tool for Web Posting**

The contractor shall finalize the Draft CSO Modeling Tool, which has been developed during the Option Period 2, with necessary editing and making it 508 compliance for EPA web posting.

**DELIVERABLES:**

- Draft version of the CSO Modeling Tool within 2 weeks of receiving TD from WACOR
- Final version of the CSO Modeling Tool within 2 weeks of receiving comments from WACOR

**Special Instruction:**

- EPA believes the LOE for this task will be as below.
  - PM – 05
  - QA Manager – 01
  - PL4 = 10
  - PL3 = 20
  - Total = 36 LOE

#### **TASK 5 – Pilot Testing CSO Modeling Tool and Making Necessary Adjustment**

The contractor shall pilot test the CSO Modeling Tool developed in Task # 4 to find out the effectiveness of the tool and make the necessary adjustment based on the result of pilot test.

- The contractor shall find out 2 CSO communities in coordination with the WACOR, EPA Regions, States, and CSO Permittees for pilot testing
- Selected CSO Permittees must have minimum CSO monitoring capability to verify the CSO Model in a real time
- The contractor shall also submit a summary report of Pilot Test findings to WACOR

#### **DELIVERABLES:**

- Draft version of the revised, if necessary, CSO Modeling Tool to WACOR within 4 weeks of finishing the Pilot Test
- Final version of the CSO Modeling Tool within 4 weeks of receiving comments from WACOR
- Summary Report of findings within 4 weeks of finalizing the CSO Modeling Tool

#### **Special Instruction:**

- EPA believes the LOE for this task will be as below.
  - PM – 10
  - QA Manager – 05
  - PL4 = 30
  - PL3 = 75
  - Total = 120 LOE

#### **TASK 6 – Developing the Quality Assurance Project Plan (QAPP)**

EPA requires that all environmental data used in decision making be supported by an approved QAPP. Tasks 1 and 2 of the WA require a QAPP.

**Incremental QAPP Development:** To facilitate getting the work started as soon as practicable, the contractor and WACOR may determine which work needs to be

initiated first and the most advantageous sequence for beginning the remainder of the work. Then the contractor may develop the QAPP incrementally, and the Quality Assurance (QA) Coordinator shall review and approve the QAPP section by section according to the optimum sequence for getting the data-related activities started. As the contractor learns what data shall be involved, the contractor can develop the data specific portion(s) of the QAPP. Each portion of the QAPP shall include a data element table.

**QAPP Submittal:** The contractor shall submit the draft QAPP for a data-related activity at least 15 working days before the activity's anticipated start-work date. Before preparing the first few sections of the QAPP, the contractor should meet or confer with WACOR and QA Coordinator to discuss developing the QAPP.

**Data Quality Requirements:** The contractor shall develop data quality requirements (DQRs) and methods for achieving them for the data elements in their deliverables. Descriptions of data quality requirements (DQRs) and methods for achieving these DQRs developed under this work assignment shall be added to the Office of Water DQR library for use in developing QAPPs for future projects. Such descriptions of DQRs and methods for achieving them shall be the property of EPA.

## **DELIVERABLES:**

- A. A QAPP that describes the contractor's plan for
  - Identifying the data elements for any data-related activities, and for each of these data elements identifying either (i) the data quality requirements (DQRs) or (ii) the policy that states DQRs are not required,
  - Describing their methods for achieving the DQRs, and
  - Assuring any environmental data contained in the deliverables shall (i) be of sufficient quality for their intended primary uses and (ii) have adequate quality documentation for determining whether these data are of sufficient quality for future secondary uses.

## **6. ESTIMATED LEVEL OF EFFORT:**

The estimated level of effort (LOE) for this work assignment is 871 hours.

## **7. OTHER REQUIREMENTS:**

### **TRAVEL:**

The travel shall be in accordance with FAR and EPAAR and shall be approved by the Contract level COR prior to travel.

## **SPECIAL REPORTING REQUIREMENTS:**

In addition to the reporting requirements in the contract, the contractor shall track and report LOE and cost expenditures by individual TASKs and sub-TASKs in the monthly progress report. The contractor shall provide monthly cost breakdown by specific line items and make necessary adjustment as needed and suggested by WACOR.

Also, the contractor shall submit brief reports on the status of the entire task within this work assignment. This report shall provide a narrative summary on the status of each task.

### **TECHNICAL DIRECTIONS:**

WACOR and Alternate WACOR will be providing technical directions as needed. The Contractor shall be obligated only to the technical directions provided by the WACORs.

### **SECTION 508 REQUIREMENTS:**

In 1998, Congress amended the Rehabilitation Act of 1973 to require Federal agencies to make their electronic and information technology (EIT) accessible to people with disabilities. The law (29 U.S.C. § 794 (d)) applies to all Federal agencies when they develop, procure, maintain, or use electronic and information technology. Under Section 508, agencies must give disabled employees and members of the public access to information that is comparable to access available to others. The contractor shall make sure all documents created for EPA are in compliance with Section 508 requirements.

### **CONFERENCE/MEETING GUIDELINES AND LIMITATIONS**

The contractor shall immediately alert the WACOR to any anticipated event under the work assignment which may result in incurring an estimated \$20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The WACOR will then prepare approval internal paperwork for the event and shall advise the contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

### **PERFORMANCE REQUIREMENTS AND MEASURABLE STANDARDS**

This WA will be evaluated in accordance with the Quality Assurance Surveillance Plan in the contract award document.

### **SPECIAL INSTRUCTIONS:**

- The contractor shall follow the Federal Green Policy whenever it is applicable.
- The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours and cost have been expended.



<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-16-003			Contract Period 07/01/2016 To 06/30/2021			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number                      3			Wet Weather Program				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose:					Period of Performance					
<input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					From 01/13/2020 To 06/30/2020					
Comments: This amendment 000001 adds new tasks 3A and 7. A work plan/cost estimate is required.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> (Max 2)                      Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE:		871		
07/01/2016 To 06/30/2021										
This Action:								475		
Total:								1,346		
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee		LOE:				
Cumulative Approved:				Cost/Fee		LOE:				
Work Assignment Manager Name    Mohammed Billah						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 202-564-2228				
						FAX Number:				
Project Officer Name    Tangela Cooper						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 202-566-0369				
						FAX Number:				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name    Tammy Adams						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 513-487-2030				
						FAX Number:				

**PERFORMANCE WORK STATEMENT**  
**EPA CONTRACT NUMBER: EP-C-16-003**  
**WORK ASSIGNMENT NUMBER: 3-05**  
**AMENDMENT # 000001**

The purpose of this work assignment (WA) amendment 000001 is to add the following new tasks.

**TASK 3A – Final Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) Data Collection Report**

The contractor shall submit a final Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) Data Collection Report based on the TASK 3 of the original WA 3-05 Performance Work Statement. This report shall focus on the CSO control plans and Post Construction Compliance Monitoring Program data collection effort by the CSO National Pollutant Discharge Elimination System (NPDES) permittees to verify the compliance with the requirements of Clean Water Act (CWA) and CSO Policy. The report shall also provide the suggestion of CSO Program way forward based on the data collection.

**Special Instruction:**

- EPA WACOR will provide technical direction(s) as needed to clarify the requirements.

**DELIVERABLES:**

- The contractor shall submit the draft report by May 15, 2020.
- The contractor shall submit the final report within two weeks of receiving comments from EPA WACOR on the draft report.

**TASK 7 - Capacity Management Operation and Maintenance (CMOM) Technical Document**

The contractor shall support EPA's effort to develop a technical document to improve CMOM activities. This document will be focusing the advancement of real-time or near real-time technological capabilities to support CMOM activities. The contractor may need to participate the work group conference call at least twice a month. EPA WACOR will be providing the necessary CMOM documents in support of developing this technical document.

**Special Instruction:**

- EPA WACOR will provide technical direction(s) as needed to clarify the requirements.

**DELIVERABLES:**

- Draft outline of the CMOM document by April 17, 2020.
- Final outline of the CMOM document within 4 weeks of receiving comments from EPA WACOR

**ESTIMATED LEVEL OF EFFORT:**

The estimated level of effort (LOE) for this work assignment is 475 hours.

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 3-06				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-16-003			Contract Period 07/01/2016 To 06/30/2021 Base                      Option Period Number    3			Title of Work Assignment/SF Site Name Permit Writers Training				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW Background Information Section, Paragraph 2					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From 07/01/2019 To 06/30/2020					
Comments: Work shall not start and cost cannot incur until July 1, 2019. On July 1, 2019, and in accordance with clause B.2 of the contract, immediate start is hereby approved for this work assignment. If the work plan is not approved within 30 calendar days after receipt of the work plan, the contractor shall stop work.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> (Max 2)                      Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:			LOE: 0					
07/01/2016 To 06/30/2021										
This Action:					1,406					
Total:					1,406					
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee			LOE:			
Cumulative Approved:				Cost/Fee			LOE:			
Work Assignment Manager Name    Nizanna Bathersfield							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"><span>(Signature)</span><span>(Date)</span></div>							Phone Number: 202-564-2258			
							FAX Number: 202-564-9544			
Project Officer Name    Tangela Cooper							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"><span>(Signature)</span><span>(Date)</span></div>							Phone Number: 202-566-0369			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"><span>(Signature)</span><span>(Date)</span></div>							Phone Number:			
							FAX Number:			
Contracting Official Name    Tammy Adams							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"><span>(Signature)</span><span>(Date)</span></div>							Phone Number: 513-487-2030			
							FAX Number:			

**PERFORMANCE WORK STATEMENT  
CONTRACT EP-C-16-003  
WORK ASSIGNMENT 3-06**

**Title:** Technical Support for Permit Writers' Training

**Work Assignment Contracting Officer's Representative (WACOR):**

Nizanna Bathersfield  
Water Permits Division  
Office of Wastewater Management  
U.S. Environmental Protection Agency  
Mail Code 4203M  
Washington, D.C. 20004  
202-564-2258  
[bathersfield.nizanna@epa.gov](mailto:bathersfield.nizanna@epa.gov)

**Alternate Work Assignment Contracting Officer's Representative (AWACOR):**

Danielle Stephan  
Water Permits Division Water Permits Division  
Office of Wastewater Management  
U.S. Environmental Protection Agency  
Mail Code 4203M  
Washington, D.C. 20004  
202-564-0759  
[stephan.danielle@epa.gov](mailto:stephan.danielle@epa.gov)

David Hair  
Office of Wastewater Management  
U.S. Environmental Protection Agency  
Mail Code 4203M  
Washington, D.C. 20004  
202-564-2287  
[hair.david@epa.gov](mailto:hair.david@epa.gov)

**Period of Performance:** July 1, 2019 through June 30, 2020

**Estimated Level of Effort:** 1,406 hours

**Background Information:** The Water Permits Division (WPD), within the Office of Wastewater Management (OWM), is responsible for implementation and oversight of the National Pollutant Discharge Elimination System (NPDES) permit program. This program

regulates point source discharges of pollutants to surface waters of the United States. Development and implementation of training, guidance and outreach/communication tools are an important part of its mission.

The objective of this work assignment is to provide technical support to WPD in its continued effort to develop and implement training, guidance, and outreach/communication activities, targeting NPDES permit writers and other key NPDES program stakeholders, such as regulated point source dischargers. Training support will include the continued development and implementation of the NPDES Permit Writers' Course, as well as other training courses and training materials that promote effective and efficient implementation of the NPDES program.

### **Performance Work Statement: Contract Section 3.9**

The administrative and technical tasks to be provided by the Contractor under this work assignment shall support management, technical and logistical tasks associated with developing training materials and delivering the NPDES Permit Writers' Training Course. The Contractor shall not be involved in Agency policy or decision making.

The Performance Work Statement establishes activities, described in the tasks below, to be conducted by the Contractor in EPA Fiscal Year (FY) 2019 and FY 2020.

### **Task 1: Support for Developing and Implementing the NPDES Permit Writer's Training Course**

A. The Contractor shall provide support for up to six 5-day NPDES permit writer courses within the period of performance. The Contractor shall provide technical and logistical support (see specific activities listed below) for developing and presenting these courses. Courses are typically limited to 50-60 participants. For planning and costing purposes, the Contractor shall assume the courses will be in the following cities; however, the specific dates and locations may be changed based on technical direction from the EPA WACOR:

- Minneapolis, Minnesota
- Washington, District of Columbia (including MD and VA suburbs)
- Sacramento, California
- Kansas City, Missouri
- Atlanta, Georgia
- US Location TBD

The Contractor shall support the EPA by conducting pre-course planning and administrative activities such as: course scheduling, including identifying and securing suitable meeting facilities; setting up and conducting registration activities; preparing and copying course handouts (including the course workbook); shipping course materials; and identifying and completing necessary revisions to course materials. The support activities shall be consistent

with the project “standard operating procedures (SOPs)” developed under a previous WA (WA 0-06) under contract EP-C-16-003, which are attached to this document at Attachment 1.

For planning purposes, the Contractor should assume that State or Federal meeting space will be provided at no cost for all of the planned courses, except for the course planned for the Washington DC area. For the Washington DC course, the Contractor shall identify and secure a meeting space at a local hotel or other conference facility with reasonable accessibility to public transportation. Prior to entering into an agreement with the hotel or conference facility, the Contractor shall coordinate with the EPA WACOR to ensure that the rental of the meeting space is consistent with EPA policies regarding meeting space rental. The EPA WACOR will provide approval of the meeting space selection through Technical Directive. (see “Requirements” below for additional conditions related to conferences and meetings)

The Contractor shall also conduct pre-course planning and administrative activities to support the EPA in preparing for up to two courses to be held in the latter half of calendar year (CY) 2020. The support will include activities such as: course scheduling, including identifying and securing suitable meeting facilities, and setting up and conducting registration activities.

B. The Contractor shall modify materials used in the presentation of the NPDES Permit Writer’s Course based on edits and information provided by the EPA WACOR. EPA estimates that materials will be revised four times during the period of performance and that revisions will be relatively minor (e.g., edits, corrections, minor updates). The NPDES Permit Writers’ Training Course materials consist of several components, including: presentation slides, an instructors’ manual, and a student workbook that cover all course modules. The Contractor shall compile, edit, and maintain all components of all course modules and the student workbook under the NPDES Permit Writers’ Training Course, including materials made available by WPD on the NPDES Permit Writers’ Course website. The Contractor shall make recommendations for the EPA WACOR’s review and approval for editing course materials and shall ensure consistency among all training course components to allow for effective maintenance of and revisions to all training course materials.

#### **Deliverables:**

1. Four revisions to NPDES Permit Writer’s Course Workbook and to incorporate changes identified by EPA.

C. The Contractor shall provide up to two qualified instructors to conduct the NPDES Permit Writers’ Training Courses identified in Task 1.A. Instructors will utilize the materials and format provided in the NPDES Permit Writers’ Course SOPs. *See* Attachment 1. A resume presenting each proposed instructor’s knowledge and experience in the NPDES program and/or related experience that warrants consideration shall be provided with the work plan. The instructors selected by the Contractor and approved by EPA for a given course shall participate in two one-hour technical and logistical conference calls with the EPA WACOR and other EPA or State instructors to discuss and coordinate training needs for each course offering. The instructors selected by the Contractor shall also meet with the EPA WACOR and EPA training

team staff to preview presentations and participate in practice sessions. EPA anticipates five half-day practice sessions during the period of performance.

D. Within 15-days following the completion of each course, the Contractor shall develop and provide to the EPA WACOR a summary report on the quality, usefulness, and presentation of the training based on comments provided by course participants as reported on a course evaluation form provided by the EPA WACOR. The Contractor shall distribute certificates of completion to course participants at the end of each workshop in-person, or via mail where necessary.

**Deliverable:** Summary of participant feedback and distribution of completion certificates within 15-days of course completion.

E. The Contractor shall revise the web-based presentations developed for the NPDES Basic Permit Writer's Course under previous WAs based on edits provided by the EPA WACOR. The revisions include updates and corrections as requested by the EPA WACOR based on user comments. Approximately 10 changes are anticipated during this period of performance. The Contractor shall use the "Articulate Storyteller" software that was used to develop the presentations. The Contractor shall continue to maintain a database file that compiles the name, affiliation, and completion date of students that submit this information through the web link following completion of the web-based training modules. The specific revisions and changes necessary to the web-based materials will be determined at a planning meeting between the Contractor and EPA WACOR prior to commencement of any revisions.

**Deliverable:**

1. Modified versions of the existing web-based presentations (2 weeks after edits are provided by EPA WACOR).
2. Database file of students that have completed the web-based training modules (final record provided to the EPA WACOR by June 30, 2020)

**Task 2: Support to Update the *U.S. EPA NPDES Permit Writers' Manual* (EPA-833-K-10-001)**

In 2016 EPA prepared a draft update to the 2010 U.S. EPA NPDES Permit Writers' Manual (EPA-833-K-10-001). The draft included updates to all Universe Resource Locators (URLs) included in the existing electronic version of the manual as well as corrections of typographical and content errors that had been identified by EPA. All of these revisions were included in a "mark-up" of an Microsoft (MS) Word version of the manual and an MS Excel spreadsheet listed all of the changes. The EPAWACOR will provide a copy of these materials to the Contractor.

Because several rulemaking efforts were underway in 2016, completion of the revisions to the manual was postponed pending finalization of the rules. These rulemaking efforts are now completed and EPA plans to finalize the update to the Permit Writers' Manual and produce the revised edition in early 2020.

- A. The contractor shall review all the internet URL addresses that were included in the 2016 draft update to the *U.S. EPA NPDES Permit Writers' Manual* (EPA-833-K-10-001) to conform to the current URL addresses. The contractor shall make the necessary changes and provide a first draft of the manual incorporating all revisions by September 30, 2019.

In addition to the web-address corrections, the contractor shall provide a list of recommended revisions and technical corrections to the existing manual based on comments collected under previous work assignments, which will be provided by the EPA WACOR, and shall provide the suggested revisions to the EPA WACOR by September 30, 2019.

The EPA WACOR will review all revisions and recommendations and meet with the contractor by December 31, 2019, to determine the necessary revisions. Based on the revisions identified by the EPA WACOR, the contractor shall revise the manual and prepare a second draft incorporating the technical revisions. The revisions incorporated in this period of performance will address only updates and clarifications to existing materials and are not anticipated to require drafting of new sections addressing additional topics. The contractor shall provide the second draft by March 31, 2020.

The EPA WACOR will review the second draft and provide any additional comments by April 30, 2020. The contractor shall revise the manual as indicated by the EPA WACOR and provide a final draft by June 30, 2020.

#### **Deliverables:**

1. First draft of the manual and suggested technical edits by September 30, 2019
2. Second draft of the manual by March 31, 2020
3. Final draft of the manual by June 30, 2020

#### **Requirements**

##### Reporting

Reports shall be submitted in accordance with the reporting requirements of the contract. In addition, the Contractor shall maintain contact with the EPA WACOR to advise of progress and problems. All documents shall be delivered in MS Word as requested by the EPA WACOR.

The Contractor shall be prepared to submit for inspection copies of all work in progress any time as requested by the EPA WACOR. The Contractor shall not release information or comments on



works performed under this work assignment without the EPA WACOR's prior written authorization. Wherever practicable, all written materials submitted to EPA must be doubled-sided and on recycled paper. All electronic media submitted to the EPA WACOR shall be scanned for and identified as free from viruses.

The Contractor shall submit drafts and final products in hard copy as well as on the appropriate electronic media in a format compatible with Water Permits Division hardware.

#### Travel

This work assignment requires travel. Specifically, one or two contractor representatives will be required to travel to the 5-day NPDES courses in Minneapolis, Minnesota, Sacramento, California, Kansas City, Missouri, Atlanta, Georgia and another location, TBD. Additionally, some local area travel may be necessary to attend the DC-area course, and to attend meetings with the EPA WACOR.

All out-of-town travel shall be approved in advance by the Contract Level Contracting Officer's Representative and shall be in accordance with the contract.

#### Information Collection

All collection of information and data shall be in accordance with the Office of Water Quality Management Plan and OMB requirements under the Paperwork Reduction Act.

#### Conference/Meeting Guidelines and Limitations

The Contractor shall immediately alert the EPA WACOR to any anticipated event under the work assignment which may result in incurring an estimated \$20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The EPA WACOR will then prepare approval internal paperwork for the event and will advise the Contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

**Note:** The Contractor shall notify the CO and EPA WACOR in writing when 75% of the authorized work assignment LOE/labor hours and cost have been expended.

### Performance Requirements and Measurable Standards

This work assignment will be evaluated in accordance with the Quality Assurance Surveillance Plan in the contract award document.

<b>Deliverable</b>	<b>Schedule</b>
<b>Task 0 (1).</b> Project Work Plan	In accordance with contract requirements.
<b>Task 0 (2).</b> Progress reports	Monthly
<b>Task 1A(1).</b> 5-Day Basic Permit Writers' Course – Minneapolis, MN	August 2019
<b>Task 1A(2).</b> 5-Day Basic Permit Writers' Course – Washington DC area (DC-MD-VA)	October/November 2019 (TBD)
<b>Task 1A(3).</b> 5-Day Basic Permit Writers' Course –Location TBD	December/January (TBD)
<b>Task 1A(4).</b> 5-Day Basic Permit Writers' Course – Sacramento, CA	February/March 2020 (TBD)
<b>Task 1A(5).</b> 5-Day Basic Permit Writers' Course – Kansas City, MO	April/May 2020 (TBD)
<b>Task 1A(6).</b> 5-Day Basic Permit Writers' Course – Atlanta, GA	May/June 2020 (TBD)
<b>Task 1B(1).</b> Permit Writers' Course Workbook Revisions.	Four revisions completed by 06/30/2020
<b>Task 1D.</b> Summary of participant feedback and distribution of completion certificates	15 days after the delivery of each course.

<b>Deliverable</b>	<b>Schedule</b>
<b>Task 1E(1).</b> Revised versions of web-based training materials posted to the EPA web site.	Within 2 weeks of receipt of EPA edits to existing materials.
<b>Task 1E(2).</b> Database file of students that have completed the web-based course modules.	Monthly via email, with database file provided to EPA WACOR by 06/30/2019.
<b>Task 2A(1).</b> Draft revisions and suggested technical corrections to the NPDES Permit Writers' Manual	September 30, 2019
<b>Task 2A(2).</b> Second draft of the NPDES Permit Writers' Manual	March 31, 2020
<b>Task 2A(3).</b> Final draft of the NPDES Permit Writers' Manual	June 30, 2020

# **ATTACHMENT 1**



EPA's NPDES Permit Writers' Course Standard  
Operating Procedures (SOPs)  
for Contractors  
Providing Logistical and Technical Support

## Table of Contents

<u>Section 1. Overview</u> .....	4
<u>Section 2: Course Standard Operating Procedures</u> .....	5
I. <u>Course Identification/Selection</u> .....	5
II. <u>Coordination with Host (State or EPA Region)</u> .....	5
III. <u>Set up Course</u> .....	5
IV. <u>Course Announcement and Initial Registration</u> .....	6
V. <u>Course Instructors—Preparation</u> .....	7
VI. <u>Course Materials—Preparation, Production</u> .....	7
VII. <u>Course Implementation (Onsite)</u> .....	8
VIII. <u>Course Deliverables</u> .....	9
<u>Section 3: Helpful Checklists</u> .....	10
<u>Section 4: Course Announcement Template</u> .....	12
<u>Section 5: Course Floor Plan Examples</u> .....	16
<u>Section 6: Evaluation Summary Example</u> .....	18
<u>Section 7: Contractor Support Overview Flowchart</u> .....	26

## **Section 1. Overview**

The following standard operating procedures (SOPs) have been developed for contractor support for the Environmental Protection Agency's (EPA's) NPDES Permit Writers' Training Course.

The objective of the NPDES Permit Writers' Course (Course) is to provide the basic regulatory framework and technical considerations that support the development of wastewater discharge permits as required under the NPDES Permit Program. The Course is designed for new permit writers, highlighting the process of developing, issuing, and complying with NPDES permits. The Course is attended by staff from EPA, states, tribes, and territories interested in learning NPDES permitting procedures. When additional space within the Course exists, the course accepts additional participants from contractors and private industry. Approximately five courses are provided each year, although the number of courses is subject to available resources and may change based on annual priorities within EPA.

The Course is held over a 5-day period, and consists of a combination of lecture, case examples, and practical exercises that are geared to acquaint participants with the tools and resources available to assist them in writing NPDES permits.

Contractor support consists of logistical, technical, and material support. EPA identifies priority locations for the course based on state/territory/tribe requests and recent course history. Course locations and dates are finalized by EPA following the release of EPA's annual budget. Once the locations and dates have been finalized, contractor support begins by providing logistical support, in concert with state and EPA Regional staff, to ensure an appropriate venue is secured and hotels for participants are identified. Additionally, the contractor shall draft a course announcement and establish and manage online participant registration.

In addition to logistical support for the course venue and registration, the contractor shall ensure all course materials are generated, secured, and delivered to the venue in advance of training course. The contractor assists with the venue set up the first morning of the course, signs in participants, and provides electronic materials for the course presentation. Additionally, the contractor provides instructor support, presenting assigned course modules over the 5-day period.

Following the 5-day course, the contractor shall collect course evaluations from the participants. Additionally, the contractor shall repackage the remaining course materials, to be shipped and stored by the contractor until the next training course. Within a week of conclusion of the training course, the contractor shall summarize the course evaluations and provide the summary to EPA for review. Corrections and revisions to course material shall be made promptly and provided to EPA for review.

The following SOPs provide detailed instruction and checklists to assist in carrying out contractor responsibilities associated with the NPDES Permit Writers' Course. This document should be updated as necessary for accuracy and comprehension.

## Section 2: Course Standard Operating Procedures

### Course Identification/Selection

Timeline: Begins 6–9 months ahead of Course

4-5 Courses/Year, including Washington DC course

#### Activities (Responsible Party)

Advertise Course during EPA Monthly Branch Chiefs' call (EPA)

EPA holds follow-up discussions with EPA Region or individual states (EPA)

States may also request Course through EPA's training website (directed to contractor)

Contractor forwards requests received via website to EPA (Contractor)

Contractor forwards request received via email to EPA (Contractor)

Negotiation with State/EPA Region (EPA)

EPA Identifies host states/EPA Regions, dates, and locations (EPA)

### Coordination with Host (State or EPA Region)

Timeline: Begins 3-6 months ahead of Course

#### Activities (Responsible Party)

States/EPA Regions identify and secure meeting space (\*except for Washington DC course) (Host)

Contractor shall identify and secure meeting space for Washington DC course, typically held in November/December (Contractor)

EPA provides contractor with Course host contact (EPA)

Contractor works with hosts to ensure minimum requirements specified in Section III.B.1 of these SOPs are considered for the venue (Contractor)

### Set up Course

Timeline: Begins 3–4 months ahead of Course

#### Activities (Responsible Party)

Specify requirements for venue (Contractor)

At least 50 students in a 10-team setup, 5 participants per team (round or rectangular tables)

Extra tables for instructors, registration, and materials (provide example Course Floor Plans in Section 5 of these SOPs)

Audio/Visual equipment to be provided by host: Projector, screen, laptop (sometimes provided), microphone, flip chart or white board

Secure hotel room block (Optional - Host)

Identify location—specific details (Host)

Meeting location

Hotels near meeting location

Nearby restaurants (optional)

Transportation requirements (is a car necessary, public transit availability)



Identify if special events are occurring at the same time as Course  
Special considerations to gain entry to venue (if applicable)

#### Course Announcement and Initial Registration

Timeline: A minimum of 2–3 months ahead of Course

##### Activities (Responsible Party)

Draft Course Announcement – based on template (Contractor)

Meeting Dates, Location, Times

List of Hotels

Transportation options

Link to Online Registration (on Eventbrite)

Online Registration – using EPA's Eventbrite Account (Contractor)

Setup event size (# of participants based on capacity of venue)

Contractor to identify a Course contact person to be posted with the announcement on EPA's website

Contractor to respond to individual requests and notify of Course Announcement, availability

Send EPA the Draft Announcement and Eventbrite Registration info for EPA to post online (EPA's website, on multiple training pages where the link will be posted)

EPA notifies Branch Chiefs and Regional Senior Permit Writers of availability of the Course Announcement and link to registration site

##### Registration

Registrants signing up after the maximum capacity is reached are automatically placed on a waiting list

Registrants receive a confirmation email notice directing them not to make non-refundable travel arrangements until they are confirmed

Confirmation email notice to Registrants

Confirmation is sent out approximately 6 weeks prior to the Course (Contractor)

If registration begins to fill up, or reaches capacity, notify EPA to decide on who receives Confirmation (Contractor)

EPA prioritizes registrants based on affiliation/organization, with priority to State and EPA regulators

Categorize registrants by affiliation/organization type and provide to EPA

Eventbrite registration captures registrants' affiliations

Color code registrants by affiliation/organization type

Send additional confirmation to confirmed registrants to confirm they are attending the Course [reduces # of no-shows]. (Contractor, 1 week ahead of Course)

(7) Backfill Course slots for no-shows from waiting list

(a) Email to confirm availability of participant based on EPA prioritization

(b) Send confirmation email to participants with availability to backfill Course slots

**Course Instructors—Preparation**

Timeline: 6-8 weeks ahead of Course

**Activities**

Initial logistics call to construct Instructors' Matrix (EPA, Contractor)

Typically 2 EPA Instructors, 1 Contractor Instructor

13 Modules comprise the Course

**Course Materials—Preparation, Production**

Timeline: At least 1 month ahead of Course

**Materials and Activities (Responsible Party)****USB of Reference Materials (Contractor)**

Purchase USBs (100-150/purchase. EPA logo, 2 to 8 GB)

Transfer Course materials to USB drives

Ensure transfer of materials to USB occurs on a virus free computer

Reference list for USB materials (part of Participants' Folder)

**CFRs (Contractor + EPA)**

Download latest version of CFRs (40 CFR parts 122, 123, 124, 125, and 133)

Magnify to fit full-size page

Convert to PDF

Contractor provides PDF file to EPA

EPA's print shop will produce ~1 month in advance, deliver to Contractor

**Workbook (Contractor)**

Revised for every Course

Print extra copies, one copy is for Instructors' use to mark up during the Course for revisions, updates

**Participants' Folders (Contractor)**

Folder Cover Insert

Agenda (green)

Course Evaluation Sheet (yellow)

Individual NPDES Permitting Process Flow Chart (white)

List of Acronyms from NPDES Permit Writers' Manual (white)

Reference materials list (contents of USB drive)—changes as new material is added (white)

Information Sources Websites (white)

Formula Sheet (orange)

Rules for Significant Figures (pink)

**Permit Writing Exercise**

Students' Exercise (white)

Application (white)

Permit File (white)

Effluent Limitation Guidelines (white)

Water Quality Standards (white)

Solutions—blue paper

Provided to students at the end of the Course

Produce 5–6 extra Participants' Folders

Team Materials [to be shipped in Instructors' Folder within Crate]

Team Names (based on water bodies in the state of Course location)

Assign participants to teams, as diverse as possible-separating affiliations

Produce Table Tent Cards (team name on both sides, color-coded)

Produce Name Tags (color-coded to Team Assignment)

Purchase Name Tag Holders

Participants' Registration Index Cards

Print Preliminary List of Participants (Registrants' List): 3–4 copies

Print List of Team Names with Assigned participants and their assigned teams: 3–4 copies

Print Certificates of Completion

Signatures are .jpg files to insert

Purchase Cardstock for Certificates

Logistics/Specific Coordination

Identify Host Contact and Shipping Address

Ship Course Materials to Course Location—Schedule to arrive Thursday/Friday before Course start

Ship Materials (see Section 3, Checklist C for full list of Course materials to be shipped):

CFRs

Participants' Folders

Workbooks

USB Drives

Crate (blue)

Instructors' Materials

Onsite Reference Materials for Instructors

Includes binder of currently-issued good example permits and fact sheets

Onsite Registration Materials

Office supplies (pens, scissors, stapler, markers, TAPE, return shipping labels, slide advancer/clicker, extra batteries)

Team Tent Cards

Name Tags and Holders

Registration Cards

Team List

Index Card Questions

Certifications of Completion

Prizes for winning team (dollar-store gift bags, NPDES sticker on gift bag, craft mugs with insert: "I'm an NPDES Superstar!")

Course Implementation (Onsite)

## Room Setup

Instructors arrive on Sunday

Monday morning – breakfast together

Meeting room – 9:00am

Identify locational logistics (rest room, etc.), A/V staff onsite

Assess room configuration and set up participants' and instructors' tables

Unpack boxes

Set up materials on team tables, randomize table tent cards

Materials: Workbook→CFRs→Participants' Folder→USB

Load PowerPoint file onto computer and do a sound check.

## Registration

Separate table

Check in registrants

Bundle of Name tag, Registration info card, Name tag holder

Verify registration contact info is accurate

If accurate, Instructor files index card

If info requires update, registrant immediately corrects info on index card, returns to Instructor

## Daily Activities

Quiz questions

Hourly breaks

Relocate teams—Materials shuffle

## Final Day

Jeopardy! on Final day

Awards to winning team

Certificates of Completion

## Closing

Collect Course evaluation forms

Collect Name tag holders

Repackage Instructors' crate and extra materials and prepare for shipment

## Course Deliverables

Timeline: Within 1 week of course completion

### Activities

Course evaluation summary report (to be summarized consistent with Section 6 of these SOPs)

Final Participants' List

Revise Course material as necessary

Materials stored on SharePoint (EPA provides access)

Set up Folder for next course on SharePoint with revised materials

### Section 3: Helpful Checklists

#### A. Course Setup

	<b>Host Identified Location</b>
	<i>-Holds at least 50 students</i>
	<b>Host Provided Venue Details</b>
	<i>-Location</i>
	<i>-Nearby Hotels</i>
	<i>-Nearby Restaurants</i>
	<i>-Transportation Requirements (public transit available or is a car necessary)</i>
	<i>-Special Events Occurring at Same Time as Course</i>
	<i>-Special Considerations to Gain Entry to Venue</i>
	<b>Host Provided Equipment</b>
	<i>-Projector</i>
	<i>-Screen</i>
	<i>-Laptop (sometimes provided)</i>
	<i>-Microphone</i>
	<i>-Flipchart or whiteboard</i>
	<i>-Tables (# of participants/5, instructor table, registration table)</i>
	<b>Host Secures Hotel Block</b>

#### B. Course Announcement/Registration

	<b>Draft Announcement Using Template</b>
	<i>-Meeting Dates, Location, Times</i>
	<i>-Preliminary Agenda</i>
	<i>-List of Hotels</i>
	<i>-Transportation Options</i>
	<b>Link to Online Registration</b>
	<b>Generate Registration Using Eventbrite</b>
	<i>-Size of Event</i>
	<i>-Identify Contractor Contact Personnel (to respond to Course inquiries)</i>
	<i>-Auto Email Setup (not to make non-refundable travel arrangements until they are confirmed)</i>
	<b>Prioritize Registrants Based on Affiliation – Provide List to EPA for Input</b>
	<b>Confirmation Email to Participants (~6 weeks prior to Course)</b>
	<b>Additional Confirmation Email Asking Participants to Notify Contractor Contact if they Can Not Make Course (to reduce number of no-shows)</b>
	<b>Backfill Course Slots Based on Prioritization (email or call to confirm registrant can make Course)</b>
	<b>Email Confirmation to Participants with Availability to Backfill Course Slots</b>

**C. Course Materials – To arrive ahead of course**

<b>Electronic Version of Course Presentation</b>
<b>Electronic Jeopardy Game</b>
<b>USB of Reference Materials</b> (course size + 5 extra)
<b>Code of Federal Regulations</b> (course size + 5 extra)
<b>Workbook</b> (course size + 5 extra)
<b>Participants Folder</b> (course size + 5 extra)
-Folder Cover Insert
-Agenda (green)
-Evaluation Form (yellow)
-Permit Development Flow Diagram (white)
-List of Acronyms (white)
-Information Sources Websites (Information Sources Websites) (white)
-Formula Sheet (orange)
-Rules for Significant Figures (pink)
-Permit Writing Exercise (white)
-Exercise Application (white)
-Exercise Effluent Limitation Guidelines (white)
-Exercise Water Quality Standards (white)
<b>Permit Writing Exercise Solutions</b> (blue)
<b>Team Materials</b>
-Table Tent Cards ([course size/5] + 1 extra)
-Name Tags (course size + ~5 extra)
-Name Card Holders (course size + ~5 extra)
-Certificates of Completion (one for each participant)
<b>Instructors' Materials (to be placed in blue crates)</b>
-Index Card Questions
-List of Team Names with Assigned Participants and Assigned Team (3-4 copies)
-Preliminary List of Participants and Registration Information (3-4 copies)
-Participants' Registration Index Cards (with extras)
-Name Tags
-Name Card Holders
-Truly Fabulous Prizes
-Reference Material Binder (good examples of permits and factsheets)
-Pens, Sharpies, and Highlighters
-Dry Erase Markers
-Scissors
-Stapler
-Post-its
-Extension cord
-Return Shipping Labels
-Slide Clicker
-Batteries for Slide Clicker
-Packing Tape (an abundant supply)
-Scotch Tape
-Copy of Course Material (Workbook, CFR, Folder, Permit Writing Exercise Solutions)

#### **Section 4: Course Announcement Template**

A draft announcement shall be provided to EPA 3 months prior to each course. Revise the course announcement template on the following pages as necessary for each course.

# U.S. ENVIRONMENTAL PROTECTION AGENCY

## NPDES PERMIT WRITERS' COURSE



City, State  
Month XX–XX, 20XX

### Course Location

State Department of Environmental Quality (SDEQ)  
Street Address | Building/Room Number | City, State  
[https://www.tceq.texas.gov/about/directory/austin\\_offices\\_map.html](https://www.tceq.texas.gov/about/directory/austin_offices_map.html)

### Course Description and Registration Information

The objective of this course is to provide the basic regulatory framework and technical considerations that support the development of wastewater discharge permits required under the National Pollutant Discharge Elimination System (NPDES) program. The course was designed for permit writers with about six months to two years of experience in the NPDES program, but experienced permit writers wanting a refresher course and other water program staff wanting to learn more about the NPDES program also are welcome.

**As a foundational course, the training does not address in detail specialized topics such as industrial and municipal stormwater, concentrated animal feeding operations, and vessel discharges. For more information on these specialized topics, please visit EPA's NPDES Web site at [www.epa.gov/npdes](http://www.epa.gov/npdes). A sample agenda for the course is attached to this announcement.**

**There is no cost for the course. Registration is available at:**  
U.S. EPA: NPDES Permit Writers' Course



For questions regarding the course materials, please contact Taylor Fontaine:  
[taylor.fontaine@pgenv.com](mailto:taylor.fontaine@pgenv.com) or call directly at (703) 956-1977.

### Course Schedule and Logistics

On-site check-in for confirmed registrants begins **Monday, Month Day, at 11:30 a.m.**, with the course beginning at **12:00 p.m.** The course concludes on **Friday, Month Day, at approximately 1:00 p.m.**

**You will need a calculator for the practical exercises during the course.**

**A workbook, course folder, one manual, and a USB drive with references will be distributed at the course.**



### Hotel Information

The following hotels are approximately one half mile north of the SDEQ building:

Fairfield Inn and Suites (512) 821-0376  
Courtyard by Marriott (512) 339- 8374  
Hilton Garden Inn (512) 339-3626

Springhill Suites by Marriott (512) 833-8100  
Residence Inn by Marriott (512) 977-0544

**PLEASE NOTE: DO NOT MAKE NON-REFUNDABLE TRAVEL ARRANGEMENTS until you receive confirmation that your registration has been accepted.**

**NPDES PERMIT WRITERS' COURSE**



## **SAMPLE AGENDA**

### **Day 1: Monday**

- 11:30 a.m. **Check-in and On-site Registration**
- 12:00 p.m. Introduction to the NPDES Permit Writers' Course
- 12:45 p.m. Module 1: Overview of the Clean Water Act
- 1:45 p.m. Module 2: Scope and Regulatory Framework of the NPDES Program
- 2:15 p.m. Module 3: NPDES Permit Types and Permitting Approaches
- 3:45 p.m. Module WT: Overview of Wastewater Treatment Processes
- 4:30 p.m. **Adjourn for the Day**

### **Day 2: Tuesday**

- 8:30 a.m. Review Questions
- 8:45 a.m. Module 4: NPDES Permit Application Process
- 9:45 a.m. *NPDES Permit Writing Exercise—Part 1*
- 11:00 a.m. Module 5A: Overview of Technology-based Effluent Limitations
- 11:15 a.m. Module 5B: Secondary Treatment Standards for POTWs
- 12:00 p.m. **Lunch Break**
- 1:15 p.m. Review Questions
- 1:30 p.m. Module 5C: Effluent Limitations Guidelines and Standards for Non-POTWs
- 3:15 p.m. Module 5D: Case-by-Case Technology-based Effluent Limitations (TBELs)
- 3:45 p.m. *NPDES Permit Writing Exercise—Part 2*
- 4:30 p.m. **Adjourn for the Day**

### **Day 3: Wednesday**

- 8:30 a.m. Review Questions
- 8:45 a.m. Module 6A: Overview of Water Quality-based Effluent Limitations (WQBELs)
- 9:00 a.m. Module 6B: Identifying the Applicable Water Quality Standards
- 10:30 a.m. *NPDES Permit Writing Exercise—Part 3, Step 1*
- 11:15 a.m. Module 6C: Characterizing the Effluent and Receiving Water
- 12:00 p.m. **Lunch Break**

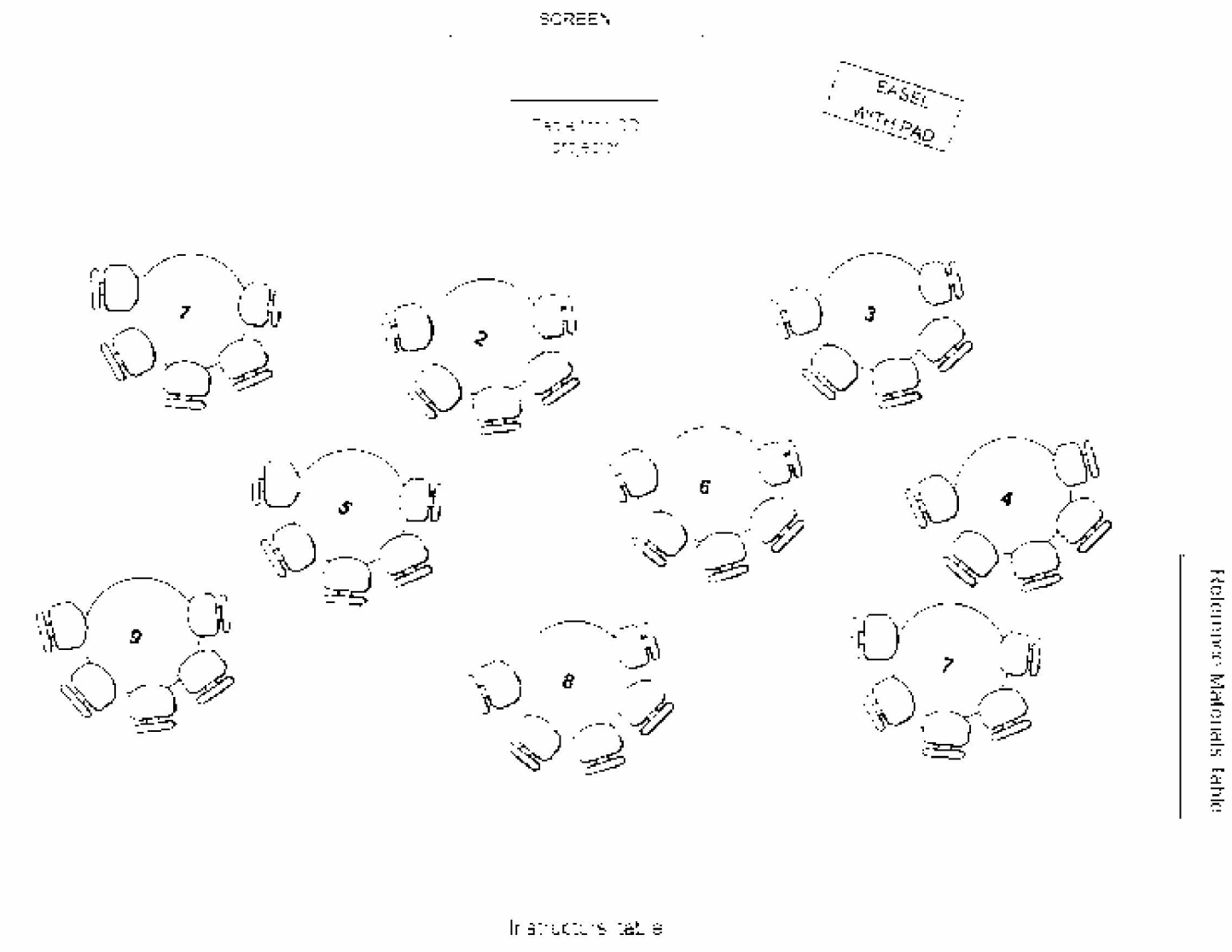
- 1:15 p.m. Review Questions
- 1:30 p.m. Module 6D: Determining the Need for Chemical-specific WQBELs
- 3:00 p.m. *NPDES Permit Writing Exercise—Part 3, Steps 2 and 3*
- 4:30 p.m. **Adjourn for the Day**

#### **Day 4: Thursday**

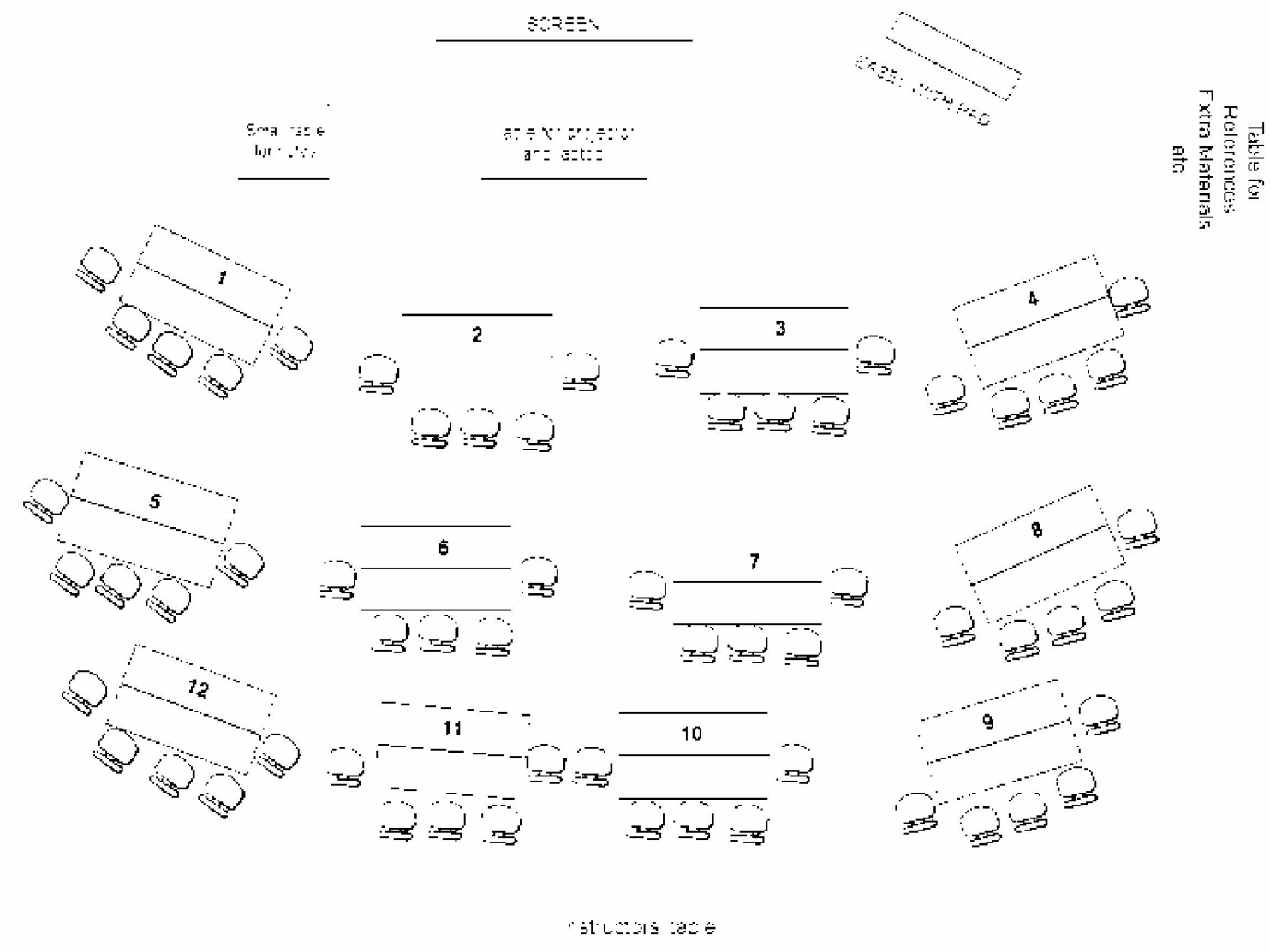
- 8:30 a.m. Review Questions
- 8:45 a.m. Module 6E: Calculating Chemical-specific WQBELs
- 9:45 a.m. *NPDES Permit Writing Exercise—Part 3, Step 4*
- 10:30 a.m. Module 7: Final Effluent Limitations
- 11:15 a.m. *NPDES Permit Writing Exercise—Part 4*
- 11:45 a.m. **Lunch Break**
- 1:00 p.m. Review Questions
- 1:15 p.m. Module 8: Monitoring and Reporting Requirements
- 2:00 p.m. *NPDES Permit Writing Exercise—Part 5*
- 2:45 p.m. Module 9A: Special Conditions
- 3:15 p.m. *NPDES Permit Writing Exercise—Part 6*
- 3:45 p.m. Module 9B: Special Conditions for Municipal Dischargers
- 4:30 p.m. **Adjourn for the Day**

#### **Day 5: Friday**

- 8:30 a.m. Review Questions
- 8:45 a.m. Module 10: Standard Conditions
- 9:30 a.m. Module 11: The Administrative Process
- 11:00 a.m. *NPDES Permit Writing Exercise—Part 7*
- 11:30 a.m. Course Review
- 12:30 p.m. **Adjourn**

**Section 5: Course Floor Plan Examples****Example 1. Floor Plan with Round Tables**

### Example 2. Floor Plan with Rectangular Tables



## Section 6: Evaluation Summary Example

### U.S. EPA NPDES PERMIT WRITERS' COURSE

PIERRE, SOUTH DAKOTA

SEPTEMBER 8 – 12, 2014

#### EVALUATION SUMMARY

The NPDES Permit Writers' Course held in Pierre, South Dakota had 31 participants in the course. The affiliations represented at the training course included:

- Arizona Department of Environmental Quality
- City of Twin Falls, Idaho
- Montana Department of Environmental Quality
- North Dakota Department of Health
- South Dakota Department of Environment and Natural Resources
- U.S. Environmental Protection Agency – Region 4
- U.S. Environmental Protection Agency – Region 5
- Washington State Department of Ecology
- Wisconsin Department of Natural Resources

Of the 31 participants, 24 completed all or part of the evaluation form. The target audience of the NPDES Permit Writers' Course is new employees and employees with less than two years of experience. The following shows the experience levels of the participants who completed this section of the evaluation.

- No experience – 3
- Less than 1 year – 9
- 1 – 2 years – 7
- 2 – 5 years – 2
- 5 – 10 years – 1

<b>PRESENTATION EVALUATION</b>
--------------------------------

MODULE NUMBER	MODULE SUBJECT	EXCELLENT (5) – POOR (1)					
		5	4	3	2	1	Av g.
<b>1</b>	Overview of CWA and NPDES Program	29%	50%	21%	-	-	4.1
<b>2</b>	Scope and Regulatory Framework	30%	57%	13%	-	-	4.2
<b>3</b>	NPDES Permits: Types and Coverage	25%	54%	21%	-	-	4.0
<b>4</b>	NPDES Permit Application Process	25%	54%	21%	-	-	4.0
<b>WT</b>	Overview of Wastewater Treatment Processes	25%	46%	29%	-	-	4.0
<b>5A</b>	Overview of Technology-based Effluent Limitations	29%	46%	21%	4%	-	4.0
<b>5B</b>	Secondary Treatment Standards for POTWs	30%	48%	17%	4%	-	4.0
<b>5C</b>	Effluent Limitations Guidelines and Standards	35%	48%	13%	4%	-	4.1
<b>5D</b>	Case-by-Case Technology-based Effluent Limits	29%	42%	25%	4%	-	4.0
<b>6A</b>	Overview of Water Quality-based Effluent Limits	41%	54%	5%	-	-	4.4
<b>6B</b>	Identifying the Applicable Water Quality Standards	45%	45%	10%	-	-	4.4
<b>6C</b>	Characterizing the Effluent and the Receiving Water	59%	31%	5%	5%	-	4.5
<b>6D</b>	Determining the Need for Chemical-specific WQBELs	52%	44%	-	4%	-	4.4
<b>6E</b>	Developing Chemical-specific WQBELs	44%	43%	9%	4%	-	4.3
<b>7</b>	Final Effluent Limitations	39%	4%	17%	4%	-	4.1
<b>8</b>	Monitoring and Reporting Requirements	22%	61%	13%	4%	-	4.0
<b>9A</b>	Special Conditions	33%	42%	17%	8%	-	4.0
<b>9B</b>	Special Conditions for Municipal Dischargers	40%	39%	17%	4%	-	4.1
<b>10</b>	Standard Conditions	32%	45%	18%	5%	-	4.0
<b>11</b>	The Administrative Process	27%	55%	13%	5%	-	4.0
<b>Exercise</b>	Permit Writing Practical Exercise	53%	35%	12%	0%	-	4.4

**NARRATIVE COMMENTS**

**1. Did the course meet your needs and expectations?**

Yes – 20

No – 2

- Covered topics I wasn't sure about in the past.
- Good refresher of CWA.
- I am more focused on stormwater and discharge permits.
- Expected to learn the basics of permit writing. Could use more interaction and less slide reading.
- As a new employee I cannot imagine how inefficient it must be to learn all of this on the job. I feel like I am at a huge advantage because of this week.
- It was better than expected due to the welcoming from SD, the energy and personality of presenters, and the involvement of individuals.
- Didn't cover anything on CAFOs.
- Made permitting process clear.
- It exceeded my expectations. It was well organized. The breaks and exercises were adequately spaced. The material was repetitively discussed in the quizzes to provide reinforcement. The group structure is a great incentive.
- Good overview and logical step-by-step process of permitting. Every step and aspect of why we permit and how was well explored.
- Covered some questions I have had very well. Good basic info was well organized and well presented.
- Excellent presenters. You made a dry, technical course as interesting as it could be!
- This course provides a lot of information! It was helpful.
- I completed the web-based training prior to attending the workshop and this workshop helped to reinforce and add to the web-based training, as advertised.
- Gave me the confidence and the materials I need to write permits. I left the class feeling like I learned the material and can apply it. I don't have this reaction to most EPA-sponsored training classes.
- I really enjoyed the workshop. I felt like it laid a very solid foundation for writing individual permits.
- Example exercises immediately after the applicable modules were very useful.
- Workshop materials very useful.
- All aspects related to permit writer were covered.
- The first day would only be helpful for brand new people. Perhaps do that as a "pre-requisite."

- It was a little too basic.
- Yes—good mix of history, background, exploration, and application of the NPDES program/process.

**2. Based on your level of experience, was the material presented at this workshop:**

Too Basic – 2

Appropriate – 22

Too Advanced - 0

- Between too basic and appropriate. Calculations/exercises were good tools. Some of the PowerPoint material was too basic, but that is based on my experience [*1 yr, 1 mo*].
- Relatively new. Great pace and content.
- Good introduction to material of permit writing.
- Overall, the materials were presented well.
- Based on my experience with permit writing already [*3 years*], there could [have] been a little more. Maybe some specific case examples.
- With no experience (but an environmental engineering master's degree), I understand essentially everything and learned a great deal. (It really ties together everything I've learned in a very practical way – treatment, fate/transport, mixing, env. law, etc.)
- Some was too basic but only due to experience on the job.
- Course explained permitting challenges and process to develop/issue permits. Calculation examples were helpful in understanding material.
- After 2 months was able to follow and not feel overwhelmed, and could ask/understand more advanced questions.
- WQBEL —> end too fast for me. Other parts great. Day 5 was too much for me to follow... I recognize there was a lot of ground to cover... I will have to cover day 4 and 5 on my own.
- Great all-inclusive beginner course.
- The workshop helped to reinforce the knowledge of NPDES permits I already had, but also provided additional information and provided clarification on several topics.
- Some of the material was too basic (i.e., monitoring and reporting), but otherwise, it was appropriate.
- I thought at first it was too basic, but once we got into effluent limitations, it was exactly where I needed it to be to understand.
- However, not enough time was given to digest material prior to completing the exercises.
- Some team members were more advanced; therefore, the group exercises were not as productive for me.
- The material was easy to follow, but too much material presented in a short period.



- Workshop was designed to train a whole range of permit's writers from beginner to experienced.
- I would have been better off doing this 6-9 months ago but was a good way to make me more solid.
- Talk about documentation writing. We get lots of feedback over specific wording by EPA. I'd like more on that.
- I think it was about right for 1 year of experience, 10 (relatively simple) permits issued.

**3. What additional topics should be covered during the course? What topics should be dropped or modified?**

- Should modify slides to not contain too much information. My experience with learning regulations is best done through hands-on learning as you do.
- List more potential special conditions/requirements in reference to required intake monitoring for 316(b).
- Unsure.
- Since I am in the CAFO program in our state, a little more on that subject would have been more helpful.
- CAFOs should be added.
- It's difficult for me to know what should be added or dropped, having never written a permit before.
- Overlapping permit areas/issues.
- None.
- Topics were great.
- I would have liked to see more stormwater topics.
- Cover how to respond to comments.
- Modify amount of time spent on TBELs and non-POTWs as from the example, it was obvious I need to review this more thoroughly.
- Spend less time on monitoring\reporting.
- I wish there had been more information on general permits because that is primarily what I work with.
- Maybe some additional incorporation or mention of enforceability and what that means in writing a real life permit.
- Provide examples of permit provisions that are enforceable instead of a vague discussion of enforceability. (side-by-side?)

- The group exercises should be modified. I would like to work through at least one example in the class.
- Add P and N discharge requirements.
- Drop or modify overview of the CWA and the administrative process.
- Add biosolids.
- Drop 1<sup>st</sup> part and exemptions that few people, if any, will ever see or touch.
- Because modeling is so subjective, further coverage on that (for limit development) would have been good.
- Thank you for the extensive WQBEL material! I have been trying to understand that since a year ago. Keep the intense WQBEL day. It was so useful!

**4. What changes could be made to course materials (e.g., workbook, manual, exercises) to make them more useful?**

- More exercises. Some presentations could be shortened.
- The manual and workbook [are] put together well.
- Everything was well organized. Omit recommend changing anything.
- The exercises, in particular, are good learning points. Maybe include more interaction with those.
- They seem very complete and helpful.
- Maybe more of an overview of all the federal documents and their uses would be useful. (The numbers – i.e., §124.19, etc. – get a bit overwhelming.)
- None.
- Don't read word for word from the PowerPoint. I can do that myself, at home.
- More pictures/examples on PowerPoint modules.
- Good.
- The materials were very helpful – especially the CD with all the extras.
- It would have been nice to have more examples in the folders (already worked through so we have a reference).
- I'm not sure. The materials covered everything really well.
- Provide handouts with the question/answer of the review questions done in the mornings and after some of the modules.
- Course instructors were extremely knowledgeable and they kept the class interesting.
- I liked the review questions each day.
- Minimize lectures right after lunch and maybe do an exercise to prevent sleepiness.
- I think instead of teaching a wastewater treatment section, a couple hour field trip to a nearby POTW would be very useful. Or a field trip to a nearby industrial facility would be helpful when it comes to discussing different waste streams and internal monitoring.
- Identify which tables are used for WQBEL calculations. Show us where to find them, for example.

- Group exercise was not as useful. More time needed to digest material.
- I would provide more time to do the comprehensive exercises.
- Workbook is an excellent resource!
- Anti-deg in more detail.
- Language "writing style" training.
- I like that all the references are included.
- I like the materials- thanks!
- Maybe a paper copy of the TSD and Permit Writers Manual? (Keep Fed Ex in business, right?) It's good to know we can still request one from Dave.

**5. What could the course instructors do to make the course more useful/interesting?**

- More exercises.
- Not much.
- Nothing in my mind. One of the easier trainings to sit through.
- A short visit to an industrial discharger or a Q and A with a permittee would be interesting.
- More review questions. Perhaps after each break but that could be overkill.
- Could have been shorter by 2 days at least.
- More pictures on PowerPoint presentation.
- For the quizzes, go in order of the names on the board. It appeared some groups were asked questions more frequently than others or allowed to catch up to other groups.
- Not have it in Pierre, SD.
- No changes – it was great!
- Serve beer in the afternoons.
- At times it felt like the instructors were reading directly from slides. To make it more interesting try to provide additional information not directly written on slides.
- Not sure there is a lot to do to make PowerPoints and regulating interesting.
- Rethink the group exercises for students with no experience.
- Have one/two hours on lessons learned.
- Kate talks too fast and simply reads slides. We can read slides. All presenters- don't read slides.
- I like how it was broken up with lectures, questions, breaks, exercises. The jokes were pretty funny, too. Also, getting to experience all 3 instructors' teaching/lecturing styles.

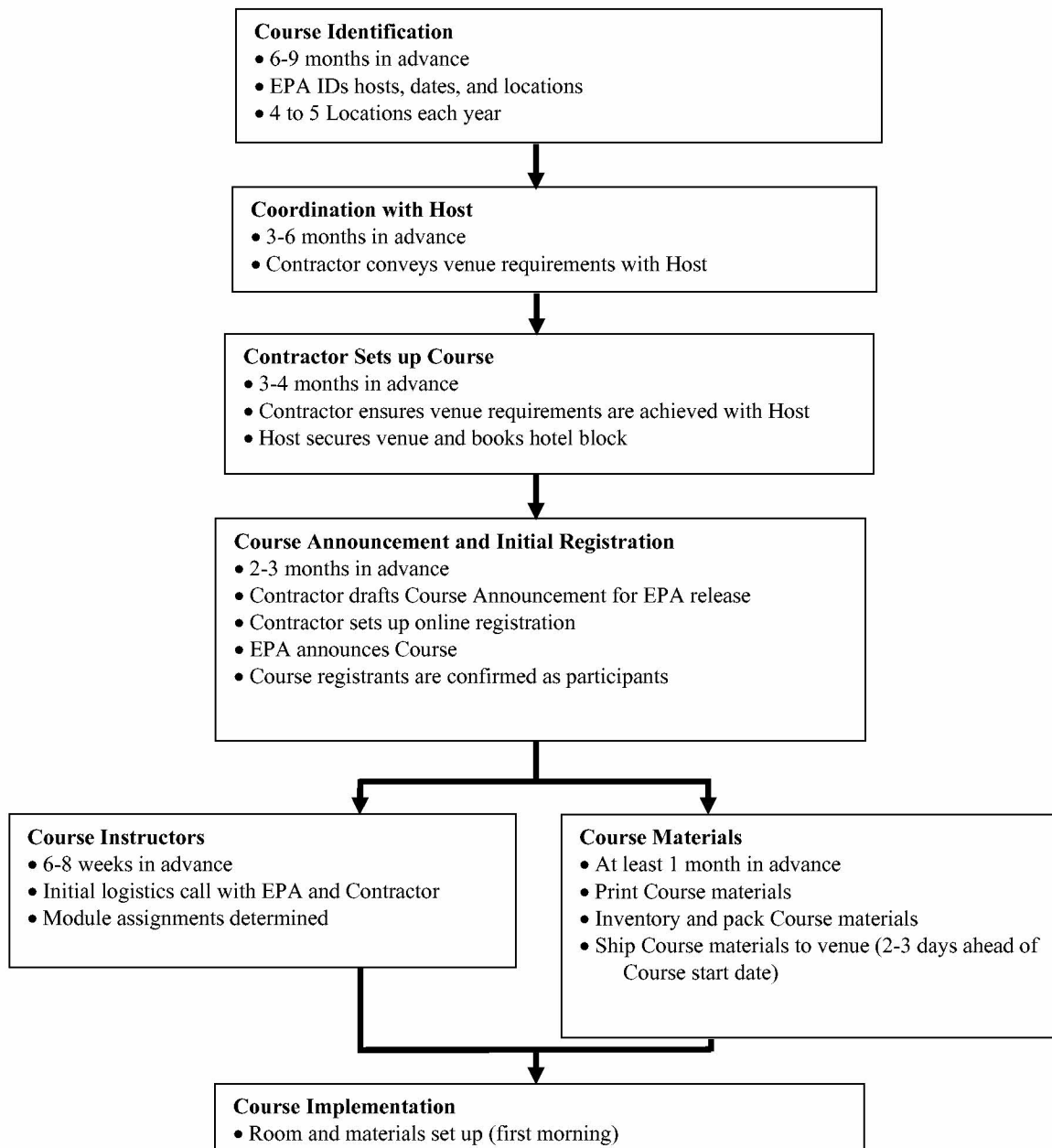
**6. Please provide any additional comments or questions.**

- An index of terms referenced on slides/course workbook would be great.
- Again, less slide by slide reading and more interaction and case by case examples.
- Coffee is great! Donuts were good. Very pleased to see half-and-half in addition to non-dairy creamer. Snacks were plentiful and generous.
- Review questions first thing in the morning are great idea.
- Kate seems to know her info but reads off the slides more often than other instructors. Possibly a function of lack of presentation experience. She is also a tiny bit fast.

## NPDES Permit Writers' Course SOPs

- Thanks!
- Thank you!
- 1<sup>st</sup> day: Kate was very knowledgeable, but was providing info too fast to keep up with.  
3<sup>rd</sup> day was better, more relaxed? Breathe, slow down and pause at end of sentences.  
(Offered as constructive comments to maximize Kate's presentation.) Thanks.
- The instructors were all very helpful, knowledgeable, and friendly. So glad I took the course!
- I learned a lot, thank you! Great training.
- Class and materials organized very well.
- I would slow down a little bit during all of Modules 5 and 6.
- I would supplement the background information with more exercises.
- Have a 2.0 that goes deeper.
- This would be good for staff to go through at state level.
- I think the questions should be closed book. People reading answers is boring.

## Section 7: Contractor Support Overview Flowchart



<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <b>EPA</b>  United States Environmental Protection Agency  Washington, DC 20460  <b>Work Assignment</b> </div> <div> Work Assignment Number  3-06 </div> </div>										
<div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number:  000001 </div> </div>										
Contract Number EP-C-16-003		Contract Period 07/01/2016 To 06/30/2020 Base Option Period Number 3		Title of Work Assignment/SF Site Name Permit Writers Training						
Contractor EASTERN RESEARCH GROUP, INC.			Specify Section and paragraph of Contract SOW See PWS.							
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval			Period of Performance From 02/12/2020 To 06/30/2020							
Comments: Amendment 000001 removes Nizanna Bathersfield as the Work Assignment Contracting Officer's Representative (WACOR) and replaces Sean Ramach as the new WACOR. A work plan/cost estimate is not required for this Amendment 000001.										
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund </div>										
SFO <input type="checkbox"/> (Max 2) Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period: 07/01/2016 To 06/30/2020		Cost/Fee:		LOE: 1,406						
This Action:				0						
Total:				1,406						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:			Cost/Fee			LOE:				
Cumulative Approved:			Cost/Fee			LOE:				
Work Assignment Manager Name Sean Ramach						Branch/Mail Code:				
<div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Phone Number: 202-564-2865				
						FAX Number:				
Project Officer Name Tangela Cooper						Branch/Mail Code:				
<div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Phone Number: 202-566-0369				
						FAX Number:				
Other Agency Official Name						Branch/Mail Code:				
<div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Phone Number:				
						FAX Number:				
Contracting Official Name Tammy Adams						Branch/Mail Code:				
<div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Phone Number: 513-487-2030				
						FAX Number:				

**PERFORMANCE WORK STATEMENT  
CONTRACT EP-C-16-003  
WORK ASSIGNMENT 3-06  
Amendment 000001**

**Title:** Permit Writers Training

**Work Assignment Contracting Officer's  
Representative (WACOR):**

Sean Ramach  
Water Permits Division  
Office of Wastewater Management  
U.S. Environmental Protection Agency  
Washington, D.C. 20004  
202-564-2865  
202-564-6392 fax  
[Ramach.sean@epa.gov](mailto:Ramach.sean@epa.gov)

**Alternate WACOR:**

Danielle Stephan  
Water Permits Division  
Office of Wastewater Management  
U.S. Environmental Protection Agency  
Washington, D.C. 20004  
202-564-0759  
202-564-6392 fax  
[stephan.danielle@epa.gov](mailto:stephan.danielle@epa.gov)

The purpose of this amendment is to remove Nizanna Bathersfield as the Work Assignment Contracting Officer's Representative (WACOR) and replace Sean Ramach as the new WACOR.